

UNITED STATES DISTRICT COURT
SOUTHER DISTRICT OF NEW YORK

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VALENTIA VILLETTI and FAIZA JIBRIL, M.D.,

Plaintiffs,

Index No.
18 Civ. 10200 (VSB)

-against-

GUIDEPOINT GLOBAL, LLC,

Defendant.

- - - - - x

One Battery Park Plaza
New York, New York

November 14, 2019
2:16 p.m.

CONTINUED EXAMINATION BEFORE TRIAL of
VALENTIA VILLETTI, a Plaintiff herein, taken
by DAVID J. GRECH, in the above-entitled
action, held at the above time and place,
pursuant to Order, taken before LEAH MILLER, a
Shorthand Reporter and Notary Public within
and for the State of New York.

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<p style="text-align: right;">Page 2</p> <p>1 2 APPEARANCES: 3 4 LICHTEN & BRIGHT, P.C. 5 Attorneys for Plaintiffs 6 387 Park Avenue South 7 5th Floor 8 New York, New York 10016 9 646-588-4872 10 BY: STUART LICHTEN, ESQ. 11 slichten@lichtenandbright.com 12 13 GORDON & REES SCULLY MANSUKHANI 14 Attorneys for Defendant 15 One Battery Park Plaza 16 28th Floor 17 New York, New York 10004 18 212-453-0702 19 BY: DAVID J. GRECH, ESQ. 20 dgrech@gordanrees.com 21 22 GUIDEPOINT GLOBAL, LLC 23 Attorneys for Defendant 24 675 Avenue of the Americas 25 2nd Floor New York, New York 10010 212-812-9511 BY: CATHERINE SMITH, ESQ. csmith@guidepoint.com ALSO PRESENT: DAHN LEVINE - LAW FIRM ASSOCIATE</p>	<p style="text-align: right;">Page 4</p> <p>1 V. VILLETTI 2 VALENTIA VILLETTI, the 3 Witness herein, having been first duly 4 sworn by a Notary Public of the State of 5 New York, was examined and testified as 6 follows: 7 EXAMINATION 8 BY MR. GRECH: 9 Q. State your name for the record, 10 please. 11 A. Valentia Villetti. 12 Q. State your address for the 13 record, please. 14 A. 162 East 61st Street, Unit 1B, 15 New York, New York 10065. 16 Q. Good afternoon, Ms. Villetti. 17 A. Good afternoon. 18 Q. It's been a while. So I'm just 19 going to go through our instructions 20 again. Same rules apply. If you have 21 any questions about the instructions or 22 as we go along, just ask me, ask 23 Stuart, and we will stop and address 24 it. 25 Again, David Grech with the law</p>
<p style="text-align: right;">Page 3</p> <p>1 2 STIPULATIONS 3 4 IT IS HEREBY STIPULATED AND AGREED by and 5 between the attorneys for the respective 6 parties herein, that filing, sealing and 7 certification be and the same are hereby 8 waived. 9 IT IS FURTHER STIPULATED AND AGREED 10 that all objections, except as to the form of 11 the question shall be reserved to the time of 12 the trial. 13 IT IS FURTHER STIPULATED AND AGREED 14 that the within deposition may be signed and 15 sworn to before any officer authorized to 16 administer an oath, with the same force and 17 effect as if signed and sworn to before the 18 Court and that a copy of this examination 19 shall be furnished without charge to the 20 attorney representing the witness testifying 21 herein. 22 23 24 25</p>	<p style="text-align: right;">Page 5</p> <p>1 V. VILLETTI 2 firm of Gordon & Rees. We represent 3 Guidepoint Global in this action. 4 As far as the instructions, you 5 know, this is, again, a 6 question-and-answer session. So we are 7 going to ask you some questions. 8 We may show you some -- we 9 showed you some documents last time. 10 We may show you some more documents 11 today regarding your employment with 12 Guidepoint and this lawsuit. 13 If you don't understand any of 14 those questions we might ask you, 15 please ask me to rephrase it, and I 16 will do my best to do so. 17 Your responses must be verbal. 18 No nodding, no gestures. Because the 19 reporter must take down all of your 20 responses for the transcript. 21 On that point, so that the 22 record and the transcript is clear, 23 even if you can, sort of, guess what 24 the rest of my question might be, just 25 for the sake of the purity of the</p>

<p style="text-align: right;">Page 6</p> <p>1 V. VILLETTI</p> <p>2 transcript, just let me finish the</p> <p>3 question and then you can respond.</p> <p>4 If you need a break at any time,</p> <p>5 just let us know, let me know, let</p> <p>6 Mr. Lichten know, and we will</p> <p>7 accommodate that. All that we would</p> <p>8 ask is that if there is a question</p> <p>9 pending at that point, that you answer</p> <p>10 the question and then we will move on</p> <p>11 and take your break.</p> <p>12 Do you have any questions about</p> <p>13 the questions --</p> <p>14 A. No.</p> <p>15 Q. -- about the instructions,</p> <p>16 rather. Okay. All right.</p> <p>17 MR. GRECH: Could we mark</p> <p>18 this as H, please?</p> <p>19 - - -</p> <p>20 (Whereupon, Defendant's</p> <p>21 Exhibit H, an employee agreement,</p> <p>22 was marked for identification.)</p> <p>23 - - -</p> <p>24 Q. Ms. Villetti, I'm showing you</p> <p>25 what's been marked as Defendant's</p>	<p style="text-align: right;">Page 8</p> <p>1 V. VILLETTI</p> <p>2 specifically Article 5, Section A,</p> <p>3 nondisclosure.</p> <p>4 And, Ms. Villetti, were you</p> <p>5 aware that during your employment with</p> <p>6 Guidepoint and for a period thereafter,</p> <p>7 you would be prohibited from disclosing</p> <p>8 certain information as set forth in</p> <p>9 Article 5?</p> <p>10 A. Yes.</p> <p>11 Q. And were you aware during the</p> <p>12 course of your employment and for some</p> <p>13 time thereafter, your use of</p> <p>14 proprietary information of Guidepoint</p> <p>15 would be limited, as provided in this</p> <p>16 contract?</p> <p>17 A. Yes.</p> <p>18 Q. On page three, Article 7, same</p> <p>19 question: You are aware during the</p> <p>20 course of your employment with</p> <p>21 Guidepoint and for two years</p> <p>22 thereafter, you're under an obligation</p> <p>23 not to disparage Guidepoint?</p> <p>24 A. Yes.</p> <p>25 Q. Do you recall a conversation you</p>
<p style="text-align: right;">Page 7</p> <p>1 V. VILLETTI</p> <p>2 Exhibit H for purposes of these</p> <p>3 depositions. If you could just take a</p> <p>4 moment to look at Exhibit H. And let</p> <p>5 us know when you have had that</p> <p>6 opportunity (handing).</p> <p>7 A. (Witness complied).</p> <p>8 Q. You had a chance to look at H?</p> <p>9 A. Yes.</p> <p>10 Q. Do you know what H is?</p> <p>11 A. Yes.</p> <p>12 Q. You recognize it?</p> <p>13 A. Yes.</p> <p>14 Q. And what is it?</p> <p>15 A. It's the employment agreement</p> <p>16 that I signed with Guidepoint.</p> <p>17 Q. And this was the agreement you</p> <p>18 signed effective September 11, 2017?</p> <p>19 A. Correct.</p> <p>20 Q. And on the last page of the</p> <p>21 agreement, it was signed on behalf of</p> <p>22 Guidepoint by Albert Sebag?</p> <p>23 A. Yes.</p> <p>24 Q. Ms. Villetti, if we could turn</p> <p>25 to page 2 of the employment agreement,</p>	<p style="text-align: right;">Page 9</p> <p>1 V. VILLETTI</p> <p>2 had with Dr. Jibril after your</p> <p>3 termination from Guidepoint?</p> <p>4 A. You would have to be more</p> <p>5 specific.</p> <p>6 Q. Immediately after your</p> <p>7 termination from Guidepoint, your first</p> <p>8 conversation with Dr. Jibril after your</p> <p>9 termination from Guidepoint.</p> <p>10 A. I can't recall the specifics.</p> <p>11 Q. You recall speaking to her about</p> <p>12 Albert and his girlfriend?</p> <p>13 A. I can't recall.</p> <p>14 Q. Do you recall speaking to her</p> <p>15 about the hierarchy of the company?</p> <p>16 A. I can't recall.</p> <p>17 Q. Do you recall speaking to her at</p> <p>18 that point about how the hierarchy of</p> <p>19 the company mistreated women?</p> <p>20 A. I don't recall.</p> <p>21 Q. One of your allegations in this</p> <p>22 case is that Guidepoint, as a company,</p> <p>23 mistreated you based upon your gender,</p> <p>24 correct?</p> <p>25 A. Correct.</p>

<p style="text-align: right;">Page 10</p> <p>1 V. VILLETTI</p> <p>2 Q. And specifically Mr. Sebag?</p> <p>3 A. Yes.</p> <p>4 Q. Mr. Sebag signed your employment</p> <p>5 agreement on behalf of the company,</p> <p>6 correct?</p> <p>7 A. Yes.</p> <p>8 Q. In September 2017, when he</p> <p>9 signed that agreement, did he express</p> <p>10 to you anything that you might</p> <p>11 interpret as being discriminatory</p> <p>12 against women?</p> <p>13 A. I don't understand the question.</p> <p>14 Q. September 2017 --</p> <p>15 A. Uh-huh.</p> <p>16 Q. -- when you're first coming on</p> <p>17 board to Guidepoint --</p> <p>18 A. Yes.</p> <p>19 Q. -- did Mr. Sebag do anything</p> <p>20 that made you feel that he had animus</p> <p>21 towards women?</p> <p>22 A. I don't recall.</p> <p>23 Q. Okay.</p> <p>24 MR. GRECH: Can we mark this</p> <p>25 as I, please?</p>	<p style="text-align: right;">Page 12</p> <p>1 V. VILLETTI</p> <p>2 A. (Witness complied).</p> <p>3 Q. Have you had a chance to review</p> <p>4 Exhibit I?</p> <p>5 A. Yes.</p> <p>6 Q. And do you recognize it?</p> <p>7 A. Yes.</p> <p>8 Q. And what is it?</p> <p>9 A. It's an employment handbook.</p> <p>10 Q. Is it Guidepoint's employment</p> <p>11 handbook?</p> <p>12 A. It appears so, yes.</p> <p>13 Q. Do you recall receiving this</p> <p>14 handbook when you were employed by</p> <p>15 Guidepoint?</p> <p>16 A. Not exactly. But, yes, I'm sure</p> <p>17 I did.</p> <p>18 Q. Okay. And if we can look at</p> <p>19 Exhibit J. Take a moment to look at J.</p> <p>20 A. (Witness complied).</p> <p>21 Q. Do you recognize J?</p> <p>22 A. Yes.</p> <p>23 Q. What's J?</p> <p>24 A. It's a receipt for the employee</p> <p>25 handbook.</p>
<p style="text-align: right;">Page 11</p> <p>1 V. VILLETTI</p> <p>2 - - -</p> <p>3 (Whereupon, Defendant's</p> <p>4 Exhibit I, employment policies,</p> <p>5 was marked for identification.)</p> <p>6 - - -</p> <p>7 (Whereupon, Defendant's</p> <p>8 Exhibit J, a receipt for employee</p> <p>9 handbook, was marked for</p> <p>10 identification.)</p> <p>11 - - -</p> <p>12 Q. Ms. Villetti, we are showing you</p> <p>13 what's been marked --</p> <p>14 - - -</p> <p>15 (Whereupon, a discussion was</p> <p>16 held off the record.)</p> <p>17 - - -</p> <p>18 Q. We are showing you what's been</p> <p>19 marked as Defendant's Exhibits both I</p> <p>20 and J for the purposes of these</p> <p>21 depositions. If you could just -- and</p> <p>22 they work together.</p> <p>23 So if you could just look at I</p> <p>24 and J together and let me know when you</p> <p>25 have had a chance to do so (handing).</p>	<p style="text-align: right;">Page 13</p> <p>1 V. VILLETTI</p> <p>2 Q. It's an acknowledgement that you</p> <p>3 received the employee handbook?</p> <p>4 A. Yes, correct.</p> <p>5 Q. Okay. And in -- the text in</p> <p>6 Exhibit J, the receipt, you see the</p> <p>7 caution there that I understand that</p> <p>8 Guidepoint is an at-will employer. And</p> <p>9 as such, employment with Guidepoint is</p> <p>10 not for a fixed term or definite period</p> <p>11 and may be terminated at the will of</p> <p>12 either party with or without cause and</p> <p>13 without prior notice.</p> <p>14 Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. And you were aware when you came</p> <p>17 on board with Guidepoint that your</p> <p>18 employment was at will?</p> <p>19 A. Yes.</p> <p>20 Q. And do you recall your testimony</p> <p>21 during the first part of your</p> <p>22 deposition where one of your concerns</p> <p>23 had been that an employee was let go</p> <p>24 without consulting with her team; do</p> <p>25 you remember that?</p>

<p style="text-align: right;">Page 14</p> <p>1 V. VILLETTI</p> <p>2 A. Yes.</p> <p>3 Q. Was that included in any of the</p> <p>4 guidance given to you in the employee</p> <p>5 handbook that your termination was</p> <p>6 dependant upon consulting with your</p> <p>7 team?</p> <p>8 A. No.</p> <p>9 Q. If you could go back to Exhibit</p> <p>10 I, please, the employment policies.</p> <p>11 And specifically, it's page 11 of the</p> <p>12 document, the section entitled</p> <p>13 procedures for reporting harassment or</p> <p>14 discrimination.</p> <p>15 Do you see that section?</p> <p>16 A. Yes.</p> <p>17 Q. Paragraph 1 reads Guidepoint</p> <p>18 encourages but does not require</p> <p>19 individuals who believe they are being</p> <p>20 harassed or are subjected to</p> <p>21 discrimination or who are aware of such</p> <p>22 conduct to promptly tell the offender</p> <p>23 that his or her behavior is unwelcome</p> <p>24 and then ask that it's stopped.</p> <p>25 Do you see that?</p>	<p style="text-align: right;">Page 16</p> <p>1 V. VILLETTI</p> <p>2 Q. And did you ever tell Mr. Rutwik</p> <p>3 that certain behavior of his you had</p> <p>4 considered harassing or discriminatory?</p> <p>5 A. Yes.</p> <p>6 Q. And did you ever tell Mr. Sebag</p> <p>7 the same thing? Did you tell him that</p> <p>8 you had considered any of his conduct</p> <p>9 harassing or discriminatory?</p> <p>10 A. I didn't have the chance.</p> <p>11 Q. And why did you not?</p> <p>12 A. The CEO's often not in the</p> <p>13 office. And when he is, he is not</p> <p>14 readily available to employees. So I</p> <p>15 did that through my supervisor.</p> <p>16 Q. And who was your supervisor</p> <p>17 again?</p> <p>18 A. Bouker Pool.</p> <p>19 Q. So you told Mr. Pool that</p> <p>20 certain conduct of Mr. Sebag you</p> <p>21 considered harassing or discriminatory?</p> <p>22 A. Yes.</p> <p>23 Q. And do you recall what you</p> <p>24 specifically reported to Bouker; what</p> <p>25 was the conduct that you complained</p>
<p style="text-align: right;">Page 15</p> <p>1 V. VILLETTI</p> <p>2 A. Yes.</p> <p>3 Q. And you're aware of that</p> <p>4 procedure when you worked at</p> <p>5 Guidepoint?</p> <p>6 A. I can't recall.</p> <p>7 Q. You can't recall if you were</p> <p>8 aware of it?</p> <p>9 A. At the time, yes.</p> <p>10 Q. You cannot recall if you were</p> <p>11 aware at the time?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. Thank you.</p> <p>14 And you have made allegations of</p> <p>15 gender discrimination here, correct?</p> <p>16 A. Yes.</p> <p>17 Q. And who would be the offenders</p> <p>18 of the gender discrimination that's</p> <p>19 against you at Guidepoint?</p> <p>20 A. It would be Mr. Sebag and Rutwik</p> <p>21 Ghodadra.</p> <p>22 - - -</p> <p>23 (Whereupon, a discussion was</p> <p>24 held off the record.)</p> <p>25 - - -</p>	<p style="text-align: right;">Page 17</p> <p>1 V. VILLETTI</p> <p>2 about about Mr. Sebag?</p> <p>3 A. We had several conversations</p> <p>4 about this as it pertained to Ashlee,</p> <p>5 as it pertained to Jessica, as well as</p> <p>6 about Dr. Jibril, and then myself, when</p> <p>7 I came back from Boston.</p> <p>8 Q. And you considered Mr. Sebag's</p> <p>9 conduct towards you during the Boston</p> <p>10 trip and thereafter discriminatory or</p> <p>11 harassing?</p> <p>12 A. Yes.</p> <p>13 Q. In what respects?</p> <p>14 A. I felt that his behavior would</p> <p>15 not have been the same had I been a</p> <p>16 man.</p> <p>17 Q. And what behavior was he</p> <p>18 engaging in with you that made you come</p> <p>19 to that conclusion?</p> <p>20 A. He called me on my cell and was</p> <p>21 very demeaning.</p> <p>22 Q. And was this the call when you</p> <p>23 were in Boston when he called you on</p> <p>24 your cell?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 18</p> <p>1 V. VILLETTI</p> <p>2 Q. Okay. And in what ways was his</p> <p>3 conversation demeaning to you?</p> <p>4 A. He was loud and had a very</p> <p>5 condescending tone and did not give me</p> <p>6 any opportunity to explain the context,</p> <p>7 just talked down at me.</p> <p>8 Q. And it's your belief that he</p> <p>9 would not have had such conversations</p> <p>10 were you a man?</p> <p>11 A. Yes.</p> <p>12 Q. Had you ever had the occasion to</p> <p>13 listen to Mr. Sebag talk to a male</p> <p>14 employee under similar circumstances?</p> <p>15 A. No.</p> <p>16 Q. And why, again, was Mr. Sebag</p> <p>17 concerned about your presence in</p> <p>18 Boston?</p> <p>19 A. You would have to ask him.</p> <p>20 Q. What did he express to you was</p> <p>21 his concern about why you were in</p> <p>22 Boston?</p> <p>23 A. That I was -- I had not</p> <p>24 consulted him prior to the trip.</p> <p>25 Q. And you recall your testimony</p>	<p style="text-align: right;">Page 20</p> <p>1 V. VILLETTI</p> <p>2 Q. In this conversation that Bouker</p> <p>3 had with you relating this exchange</p> <p>4 with Albert, did Bouker express to you</p> <p>5 he felt demeaned during this</p> <p>6 conversation?</p> <p>7 A. No.</p> <p>8 Q. Or that Mr. Sebag was</p> <p>9 condescending to him?</p> <p>10 A. No.</p> <p>11 Q. Did Bouker tell you that Albert</p> <p>12 raised his voice to him on the slopes?</p> <p>13 A. I don't recall.</p> <p>14 Q. If we could look back at Exhibit</p> <p>15 I, the second paragraph in procedures</p> <p>16 for reporting harassment and</p> <p>17 discrimination. It's on page 11.</p> <p>18 The paragraph reads whether or</p> <p>19 not an individual chooses to confront</p> <p>20 the offender directly, the individual</p> <p>21 should promptly notify his or her</p> <p>22 supervisor or human resources and</p> <p>23 submit an employee complaint form,</p> <p>24 which can be found on Guidepoint's</p> <p>25 internet and in human resources at any</p>
<p style="text-align: right;">Page 19</p> <p>1 V. VILLETTI</p> <p>2 last time of concerns you believe</p> <p>3 Mr. Sebag had about Mr. Pool's</p> <p>4 vacationing and absences?</p> <p>5 A. Yes.</p> <p>6 Q. Were you ever witness to</p> <p>7 Mr. Sebag counseling Mr. Pool about his</p> <p>8 vacations and absences?</p> <p>9 A. No.</p> <p>10 Q. Did Mr. Pool share any of that</p> <p>11 with you; that Albert had said certain</p> <p>12 things to him about absences or</p> <p>13 vacations?</p> <p>14 A. Yes.</p> <p>15 Q. And what did Bouker say?</p> <p>16 A. Bouker said that while he was on</p> <p>17 the ski slope, he encountered</p> <p>18 Mr. Sebag. And Mr. Sebag expressed a</p> <p>19 great deal of frustration with him</p> <p>20 being on the slope and asked him what</p> <p>21 he was doing there. To which he</p> <p>22 responded he was on vacation. And</p> <p>23 Mr. Sebag expressed that he had not</p> <p>24 authorized it. And Bouker said that he</p> <p>25 had. And they went back and forth.</p>	<p style="text-align: right;">Page 21</p> <p>1 V. VILLETTI</p> <p>2 time.</p> <p>3 Do you see that, Ms. Villetti?</p> <p>4 A. Yes.</p> <p>5 Q. Were you aware of the existence</p> <p>6 of such an employee complaint form when</p> <p>7 you were with Guidepoint?</p> <p>8 A. No.</p> <p>9 Q. Did you ever submit an employee</p> <p>10 complaint form to your supervisor?</p> <p>11 A. No.</p> <p>12 Q. And your supervisor would have</p> <p>13 been Bouker?</p> <p>14 A. Yes.</p> <p>15 Q. Did you ever submit an employee</p> <p>16 complaint form to HR?</p> <p>17 A. No.</p> <p>18 Q. You did make a complaint to HR,</p> <p>19 though, right?</p> <p>20 A. Yes.</p> <p>21 Q. And if you see the next section,</p> <p>22 it's an investigation of complaints</p> <p>23 section.</p> <p>24 You see that section?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 22</p> <p>1 V. VILLETTI</p> <p>2 Q. And what is your knowledge of</p> <p>3 the investigation of your complaint to</p> <p>4 HR?</p> <p>5 A. I don't know.</p> <p>6 Q. You don't know what your</p> <p>7 knowledge is of the complaint?</p> <p>8 A. I don't know what the extent of</p> <p>9 the investigation was, if any.</p> <p>10 Q. Was your complaint investigated?</p> <p>11 A. I don't know.</p> <p>12 Q. Who did you make the complaint</p> <p>13 to?</p> <p>14 A. Priscilla.</p> <p>15 Q. Separate and apart from your</p> <p>16 complaint, when you were at Guidepoint,</p> <p>17 were you ever asked to participate in</p> <p>18 an investigation?</p> <p>19 A. I can't recall.</p> <p>20 MR. GRECH: Could we mark</p> <p>21 this as K?</p> <p>22 - - -</p> <p>23 (Whereupon, Defendant's</p> <p>24 Exhibit K, an e-mail exchange,</p> <p>25 was marked for identification.)</p>	<p style="text-align: right;">Page 24</p> <p>1 V. VILLETTI</p> <p>2 9:23 a.m.; is that correct?</p> <p>3 A. Yes.</p> <p>4 Q. And this is what you are deeming</p> <p>5 your complaint, correct?</p> <p>6 A. Yes.</p> <p>7 Q. And thereafter, there is an</p> <p>8 exchange between you and Priscilla,</p> <p>9 correct?</p> <p>10 A. Yes.</p> <p>11 Q. All right. So if we could look</p> <p>12 first at your first e-mail on</p> <p>13 March 12th. In the second paragraph,</p> <p>14 you make reference to over the past</p> <p>15 several months that you had brought</p> <p>16 management issues and toxic work</p> <p>17 environment in our team to the</p> <p>18 attention of both you, meaning</p> <p>19 Priscilla and John.</p> <p>20 Who is John?</p> <p>21 A. John Campanella who is the CFO.</p> <p>22 Q. So over the past several months,</p> <p>23 when was the first time you brought</p> <p>24 management issues and toxic work</p> <p>25 environment to Priscilla's attention?</p>
<p style="text-align: right;">Page 23</p> <p>1 V. VILLETTI</p> <p>2 - - -</p> <p>3 Q. Ms. Villetti, we are showing you</p> <p>4 what's been marked as Defendant's</p> <p>5 Exhibit K. If you could take a moment</p> <p>6 to look at that, please (handing).</p> <p>7 A. (Witness complied).</p> <p>8 Q. Ms. Villetti, you have had a</p> <p>9 chance to review Exhibit K?</p> <p>10 A. Yes.</p> <p>11 Q. Do you recognize it?</p> <p>12 A. Yes.</p> <p>13 Q. And what is it?</p> <p>14 A. It's an e-mail complaint that I</p> <p>15 sent to Priscilla requesting a meeting</p> <p>16 to discuss what I perceived to be</p> <p>17 continuous mistreatment of women at</p> <p>18 Guidepoint.</p> <p>19 Q. And Exhibit K is an e-mail</p> <p>20 exchange or e-mail chain between you</p> <p>21 and Priscilla?</p> <p>22 A. Yes.</p> <p>23 Q. And it -- the first e-mail in</p> <p>24 time in Exhibit K is your e-mail to</p> <p>25 Priscilla dated March 12, 2018 at</p>	<p style="text-align: right;">Page 25</p> <p>1 V. VILLETTI</p> <p>2 A. I don't recall the specifics.</p> <p>3 But I had several conversations with</p> <p>4 her about this.</p> <p>5 Q. Had you documented your concerns</p> <p>6 prior to this e-mail?</p> <p>7 A. In writing, no.</p> <p>8 Q. And when did you first speak</p> <p>9 with John about management issues and</p> <p>10 toxic work environment?</p> <p>11 A. I don't recall the exact dates.</p> <p>12 Q. Did you document any of those</p> <p>13 complaints to John?</p> <p>14 A. In writing, no.</p> <p>15 Q. Did you document it in any other</p> <p>16 way?</p> <p>17 A. No. I had spoken conversations</p> <p>18 with him.</p> <p>19 Q. With John and Priscilla?</p> <p>20 A. Yes.</p> <p>21 Q. Predating this e-mail complaint?</p> <p>22 A. Yes.</p> <p>23 Q. And at the time you were writing</p> <p>24 this e-mail, what management issues did</p> <p>25 you have in mind?</p>

<p style="text-align: right;">Page 26</p> <p>1 V. VILLETTI</p> <p>2 A. I think one of the main concerns</p> <p>3 I had at the time was that Rutwik, who</p> <p>4 was not even an employee of Guidepoint,</p> <p>5 was appearing to take a management role</p> <p>6 at my team. And we had not had any</p> <p>7 communication from HR otherwise about</p> <p>8 him being an employee or us reporting</p> <p>9 to him otherwise.</p> <p>10 Q. And how did you know that Rutwik</p> <p>11 was or was not a Guidepoint employee?</p> <p>12 A. He was a consultant in the</p> <p>13 system.</p> <p>14 Q. Were there other consultants in</p> <p>15 the system at the time?</p> <p>16 A. I don't know. I wasn't</p> <p>17 interacting with them.</p> <p>18 Q. And a consultant is not an</p> <p>19 employee?</p> <p>20 A. I don't know.</p> <p>21 Q. In what ways was Rutwik</p> <p>22 attempting to take management of your</p> <p>23 team?</p> <p>24 A. He felt he could dictate what</p> <p>25 each member of the team was to do, when</p>	<p style="text-align: right;">Page 28</p> <p>1 V. VILLETTI</p> <p>2 Q. Any other management issues? We</p> <p>3 will discuss them in detail. But were</p> <p>4 there any more on the list?</p> <p>5 A. Our inability to hire the staff</p> <p>6 needed to perform our job.</p> <p>7 Q. And you had communicated your</p> <p>8 concern about Bouker's absences with</p> <p>9 Priscilla before?</p> <p>10 A. Yes.</p> <p>11 Q. And you had communicated them --</p> <p>12 your concern about Bouker's absences</p> <p>13 with John before?</p> <p>14 A. I don't know.</p> <p>15 Q. And what was your concern about</p> <p>16 Bouker's absences?</p> <p>17 A. I felt that his frequent</p> <p>18 absences created a leadership vacuum</p> <p>19 and led to chaos.</p> <p>20 Q. All right. We talked about the</p> <p>21 management issue, focused on Rutwik.</p> <p>22 In what way, if any, did that</p> <p>23 demonstrate to you discrimination based</p> <p>24 on your gender?</p> <p>25 A. I don't understand the question.</p>
<p style="text-align: right;">Page 27</p> <p>1 V. VILLETTI</p> <p>2 they were do it. And he felt he could</p> <p>3 call us, e-mail us at all hours</p> <p>4 demanding things, pull us into</p> <p>5 meetings.</p> <p>6 Q. Was Rutwik behaving the same way</p> <p>7 toward Bouker?</p> <p>8 A. No.</p> <p>9 Q. Was Rutwik behaving that way</p> <p>10 toward anyone other than yourself?</p> <p>11 A. To my knowledge, he was also</p> <p>12 doing that to Jessica.</p> <p>13 Q. Anyone else?</p> <p>14 A. I don't know.</p> <p>15 Q. What about Justin?</p> <p>16 A. Not to my knowledge.</p> <p>17 Q. Any other management issues that</p> <p>18 were of concern to you on March 12,</p> <p>19 2018?</p> <p>20 A. There were issues with Bouker</p> <p>21 being absent frequently. And, you</p> <p>22 know, the lack of clarification</p> <p>23 surrounding my performance metrics,</p> <p>24 which I had sought clarification on. I</p> <p>25 saw that as a management failing.</p>	<p style="text-align: right;">Page 29</p> <p>1 V. VILLETTI</p> <p>2 Q. We talked about Rutwik dictating</p> <p>3 what team members were going to do and</p> <p>4 calling them and e-mailing them and</p> <p>5 calling meetings, right?</p> <p>6 A. Yes.</p> <p>7 Q. What, if any, part of that made</p> <p>8 you feel he was doing that to you</p> <p>9 because you were a woman?</p> <p>10 A. He was doing that to me and to</p> <p>11 Jessica.</p> <p>12 Q. Okay.</p> <p>13 A. And not to anyone else.</p> <p>14 Q. Who else was on the team to do</p> <p>15 that to?</p> <p>16 A. There was Justin. There was</p> <p>17 Bouker.</p> <p>18 Q. And what did you mean by toxic</p> <p>19 work environment in your complaint?</p> <p>20 A. Rutwik's presence, for one.</p> <p>21 Q. How long had Rutwik been there</p> <p>22 at this time?</p> <p>23 A. For several months, as I recall.</p> <p>24 Q. Any other components of the</p> <p>25 toxic work environment other than</p>

<p style="text-align: right;">Page 30</p> <p>1 V. VILLETTI</p> <p>2 Rutwik's presence?</p> <p>3 A. I can't recall.</p> <p>4 Q. And you talked briefly earlier</p> <p>5 about performance metrics. And you</p> <p>6 specifically mentioned that next or you</p> <p>7 said you sought clarification on your</p> <p>8 performance metrics and bonus structure</p> <p>9 repeatedly since last December with no</p> <p>10 resolve.</p> <p>11 And what was your specific</p> <p>12 concern there?</p> <p>13 A. I was not given any guidelines</p> <p>14 or structure about how my performance</p> <p>15 was being measured or my bonus was</p> <p>16 being decided.</p> <p>17 Q. And last December would have</p> <p>18 been 2017, correct?</p> <p>19 A. Correct.</p> <p>20 Q. And when did you start with</p> <p>21 Guidepoint?</p> <p>22 A. In September.</p> <p>23 Q. So had you ever received a bonus</p> <p>24 from Guidepoint?</p> <p>25 A. I believe so. There was one</p>	<p style="text-align: right;">Page 32</p> <p>1 V. VILLETTI</p> <p>2 Q. Okay. And what did you and John</p> <p>3 talk about concerning your performance</p> <p>4 metrics?</p> <p>5 A. I sought clarification.</p> <p>6 Q. And John's response was?</p> <p>7 A. He didn't provide any</p> <p>8 clarification.</p> <p>9 Q. What was John's role with the</p> <p>10 company again?</p> <p>11 A. CFO.</p> <p>12 Q. Did you speak to Albert about</p> <p>13 your performance metrics?</p> <p>14 A. No.</p> <p>15 Q. Other than Bouker and John, did</p> <p>16 you speak with anyone else about your</p> <p>17 performance metrics?</p> <p>18 A. Priscilla.</p> <p>19 Q. Okay. And when did you and</p> <p>20 Priscilla talk about your performance</p> <p>21 metrics?</p> <p>22 A. I don't recall the specifics.</p> <p>23 Q. Was it an in-person</p> <p>24 conversation?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 31</p> <p>1 V. VILLETTI</p> <p>2 bonus which came for 2017, for the end.</p> <p>3 Q. And what was your understanding</p> <p>4 of what your performance metrics were?</p> <p>5 A. I don't have an understanding of</p> <p>6 it.</p> <p>7 Q. Who did you expect to give you</p> <p>8 that understanding?</p> <p>9 A. I sought it from multiple</p> <p>10 sources. No one gave me a clear</p> <p>11 understanding.</p> <p>12 Q. Did you seek it from Bouker?</p> <p>13 A. Yes.</p> <p>14 Q. And the result was?</p> <p>15 A. I don't think he knew.</p> <p>16 Q. But he was your supervisor?</p> <p>17 A. Yes.</p> <p>18 Q. Did you seek it from Rutwik?</p> <p>19 A. I don't recall.</p> <p>20 Q. Did you seek it from John?</p> <p>21 A. Yes.</p> <p>22 Q. And in what way? Did you talk</p> <p>23 to him, call him, e-mail about your</p> <p>24 performance metrics?</p> <p>25 A. In-person meeting.</p>	<p style="text-align: right;">Page 33</p> <p>1 V. VILLETTI</p> <p>2 Q. And you asked her for</p> <p>3 clarification on your performance</p> <p>4 metrics?</p> <p>5 A. Yes.</p> <p>6 Q. And what was her response?</p> <p>7 A. She didn't provide any</p> <p>8 clarification.</p> <p>9 Q. Okay. Do you feel that the lack</p> <p>10 of clarification on your performance</p> <p>11 metrics was based in any way on your</p> <p>12 gender?</p> <p>13 A. I don't know.</p> <p>14 Q. What was your bonus structure</p> <p>15 when you were at Guidepoint?</p> <p>16 A. There was no structure.</p> <p>17 Q. You received a bonus based upon</p> <p>18 2017?</p> <p>19 A. Yes.</p> <p>20 Q. How much was the bonus?</p> <p>21 A. I don't remember. You can find</p> <p>22 it in the numbers.</p> <p>23 Q. What was it based upon?</p> <p>24 A. It was an agreed-upon amount</p> <p>25 prior to my joining the firm.</p>

<p style="text-align: right;">Page 34</p> <p>1 V. VILLETTI</p> <p>2 Q. And who made the agreement?</p> <p>3 A. Bouker and Priscilla.</p> <p>4 Q. We also talked about an</p> <p>5 inability to hire staff.</p> <p>6 And your complaint continues</p> <p>7 furthermore, I have performed under a</p> <p>8 staff shortage and the routine absence</p> <p>9 by my manager.</p> <p>10 I assume we are talking about</p> <p>11 Bouker here?</p> <p>12 A. Yes.</p> <p>13 Q. Including his most three-week</p> <p>14 break.</p> <p>15 And what staff shortage were you</p> <p>16 experiencing as reflected in your March</p> <p>17 complaint?</p> <p>18 A. My associate Liana Yamin had</p> <p>19 left at that point. And I was also</p> <p>20 instructed to increase the output of</p> <p>21 the healthcare content and</p> <p>22 simultaneously unable to hire people to</p> <p>23 do so.</p> <p>24 Q. And in what way did this staff</p> <p>25 shortage reflect, in your opinion,</p>	<p style="text-align: right;">Page 36</p> <p>1 V. VILLETTI</p> <p>2 discussed before?</p> <p>3 A. Yes.</p> <p>4 Q. And Albert on the call when you</p> <p>5 were at Boston?</p> <p>6 A. Yes.</p> <p>7 Q. Was Albert dismissive or</p> <p>8 belittling of you at any other time</p> <p>9 other than his call to you when you</p> <p>10 were at Boston?</p> <p>11 A. No. I don't recall.</p> <p>12 Q. The same paragraph, we are</p> <p>13 continuing on, your complaint reads the</p> <p>14 increasing aggression, abusive</p> <p>15 language, and unjustified deterioration</p> <p>16 of my role has led to serious anxiety,</p> <p>17 stress-induced physical pain, and</p> <p>18 difficulty sleeping for me.</p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. And who was being increasingly</p> <p>22 aggressive toward you?</p> <p>23 A. Rutwik.</p> <p>24 Q. And Rutwik would use abusive</p> <p>25 language with you?</p>
<p style="text-align: right;">Page 35</p> <p>1 V. VILLETTI</p> <p>2 gender discrimination by Guidepoint?</p> <p>3 A. Well, I was taught that I had a</p> <p>4 mandate and I was able to hire. But</p> <p>5 when I wanted to hire Dr. Jibril, I was</p> <p>6 prevented from doing so.</p> <p>7 Q. And was there anything about</p> <p>8 Ms. Yamin's departure that would lead</p> <p>9 you to the conclusion that it was based</p> <p>10 on gender discrimination?</p> <p>11 A. No. She left for another role.</p> <p>12 Because she wouldn't get a pay increase</p> <p>13 that was -- that would have been</p> <p>14 required for her to stay.</p> <p>15 Q. Okay. In the next paragraph,</p> <p>16 you say that instead, after talking</p> <p>17 about some acknowledgements, that you</p> <p>18 have endured being continuously</p> <p>19 dismissed and belittled.</p> <p>20 Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. And who dismissed and belittled</p> <p>23 you?</p> <p>24 A. Rutwik and Albert.</p> <p>25 Q. Rutwik in the same ways we have</p>	<p style="text-align: right;">Page 37</p> <p>1 V. VILLETTI</p> <p>2 A. Yes.</p> <p>3 Q. How so? I mean, do you have an</p> <p>4 example?</p> <p>5 A. Yes. When he shouted at me I am</p> <p>6 the boss of you and boss of everybody</p> <p>7 else here, there were several F bombs.</p> <p>8 Q. Gotcha.</p> <p>9 Is that the way Rutwik speaks</p> <p>10 normally?</p> <p>11 A. No.</p> <p>12 Q. Had you ever heard Rutwik drop F</p> <p>13 bombs when speaking with someone else?</p> <p>14 A. No.</p> <p>15 Q. Did Albert ever use abusive</p> <p>16 language?</p> <p>17 A. Arguably, on the call that he</p> <p>18 made to me.</p> <p>19 Q. There is a, sort of, broad</p> <p>20 interpretation of abusive language.</p> <p>21 Did Albert utter any profanities</p> <p>22 to you on the call?</p> <p>23 A. No. But his tone was hostile</p> <p>24 and demeaning.</p> <p>25 Q. Okay. In what way was Albert's</p>

<p style="text-align: right;">Page 38</p> <p>1 V. VILLETTI</p> <p>2 tone on the call then abusive?</p> <p>3 A. He shouted at me that I was not</p> <p>4 to speak and he was to talk at me</p> <p>5 essentially.</p> <p>6 Q. And this was during the</p> <p>7 telephone call while you were in</p> <p>8 Boston?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And had Albert ever</p> <p>11 displayed aggression toward you?</p> <p>12 A. No. I didn't interact with</p> <p>13 Albert.</p> <p>14 Q. Other than the call in Boston?</p> <p>15 A. Yes. And another interaction I</p> <p>16 had with him in a kitchen.</p> <p>17 Q. Okay. Was he aggressive or</p> <p>18 abusive in that interaction?</p> <p>19 A. No.</p> <p>20 Q. In what ways was Rutwik</p> <p>21 aggressive with you?</p> <p>22 A. As I mentioned before, he felt</p> <p>23 he could call us, e-mail, pull us into</p> <p>24 meetings, yell at us of what we should</p> <p>25 do or shouldn't do.</p>	<p style="text-align: right;">Page 40</p> <p>1 V. VILLETTI</p> <p>2 Q. How many trips had you taken for</p> <p>3 Guidepoint during your tenure there?</p> <p>4 A. I don't recall the specifics.</p> <p>5 Q. Do you have an estimate?</p> <p>6 A. Three, I believe.</p> <p>7 Q. Including Boston?</p> <p>8 A. Yes.</p> <p>9 Q. Did you take any trips to -- for</p> <p>10 Guidepoint work after Boston?</p> <p>11 A. No.</p> <p>12 - - -</p> <p>13 (Whereupon, a discussion was</p> <p>14 held off the record.)</p> <p>15 - - -</p> <p>16 Q. And here your complaint was that</p> <p>17 Albert had abruptly taken away your</p> <p>18 leadership of the conferences, correct?</p> <p>19 A. Yes.</p> <p>20 Q. And in what ways were you</p> <p>21 established as a leader of conferences?</p> <p>22 A. That was a part of my role.</p> <p>23 Q. What role did Bouker have with</p> <p>24 the conferences?</p> <p>25 A. Bouker just approved things at</p>
<p style="text-align: right;">Page 39</p> <p>1 V. VILLETTI</p> <p>2 Q. And you also experienced a</p> <p>3 deterioration of your role?</p> <p>4 A. Yes.</p> <p>5 Q. In what way?</p> <p>6 A. When Albert called me, he said</p> <p>7 that I was not allowed to travel</p> <p>8 anymore for my role and I was</p> <p>9 essentially not allowed to do anything</p> <p>10 without his explicit permission. And</p> <p>11 being the head of healthcare content,</p> <p>12 that had not been a part of the</p> <p>13 arrangement when I took the job.</p> <p>14 Q. And do you go into that in more</p> <p>15 detail in this next paragraph here</p> <p>16 where you say Albert effectively</p> <p>17 changed my role abruptly and taken over</p> <p>18 my leadership over the conferences?</p> <p>19 A. Yes.</p> <p>20 Q. And now seemingly any agency</p> <p>21 over teleconferences, barred me from</p> <p>22 traveling, which is essential for me to</p> <p>23 perform my job.</p> <p>24 Do you see that?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 41</p> <p>1 V. VILLETTI</p> <p>2 the late stage of a decision.</p> <p>3 Q. Did Rutwik have any role at the</p> <p>4 conferences?</p> <p>5 A. No.</p> <p>6 Q. And when we -- and we talked</p> <p>7 about this last time; conferences</p> <p>8 versus teleconferences.</p> <p>9 When we say conferences here,</p> <p>10 these are events that you would travel</p> <p>11 to?</p> <p>12 A. Not just travel to. Some were</p> <p>13 in New York. It was in-person</p> <p>14 meetings.</p> <p>15 Q. In-person meetings, thank you.</p> <p>16 Separate and apart from a</p> <p>17 teleconference, correct?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And so you would also</p> <p>20 have leadership over healthcare content</p> <p>21 teleconferences?</p> <p>22 A. Yes.</p> <p>23 Q. How many teleconferences would</p> <p>24 you have conducted while you were at</p> <p>25 Guidepoint?</p>

<p style="text-align: right;">Page 42</p> <p>1 V. VILLETTI</p> <p>2 A. Many.</p> <p>3 Q. Was there a frequency in which</p> <p>4 they occurred? Was it once a week? A</p> <p>5 couple times a -- how many -- how would</p> <p>6 you say in terms of frequency?</p> <p>7 A. It varied from once a week to</p> <p>8 three times a week.</p> <p>9 Q. And Boston was an in-person</p> <p>10 conference, correct, it wasn't a</p> <p>11 teleconference?</p> <p>12 A. Yes.</p> <p>13 Q. Did you have any teleconferences</p> <p>14 for Guidepoint after your Boston trip?</p> <p>15 A. Yes.</p> <p>16 Q. How many?</p> <p>17 A. I don't recall exactly.</p> <p>18 Probably two or three.</p> <p>19 Q. Did you have to seek Albert's</p> <p>20 approval for those two to three</p> <p>21 teleconferences?</p> <p>22 A. I had to seek Rutwik's.</p> <p>23 Q. Had you had to seek Rutwik's</p> <p>24 approval prior to these two to three</p> <p>25 conferences?</p>	<p style="text-align: right;">Page 44</p> <p>1 V. VILLETTI</p> <p>2 recruited in 2017 to serve as a subject</p> <p>3 matter expert who would lead the HLC --</p> <p>4 What does HLC stand for?</p> <p>5 A. Healthcare.</p> <p>6 Q. -- portion of the business in my</p> <p>7 group. And I accepted this position in</p> <p>8 good faith. I was also told I was</p> <p>9 joining a start-up where I would help</p> <p>10 build the team.</p> <p>11 This has all proved to be highly</p> <p>12 misleading. And I have since observed</p> <p>13 my own employment trajectory following</p> <p>14 a familiar pattern at Guidepoint.</p> <p>15 Do you see that portion of your</p> <p>16 complaint?</p> <p>17 A. Yes.</p> <p>18 Q. And who communicated to you that</p> <p>19 you were, by joining Guidepoint,</p> <p>20 joining a start-up?</p> <p>21 A. Bouker.</p> <p>22 Q. And when did he do that?</p> <p>23 A. When I was being interviewed.</p> <p>24 Q. In what respects did Bouker tell</p> <p>25 you Guidepoint was a start-up?</p>
<p style="text-align: right;">Page 43</p> <p>1 V. VILLETTI</p> <p>2 A. Approval, no.</p> <p>3 Q. What did you have to seek from</p> <p>4 Rutwik?</p> <p>5 A. I didn't have to seek anything.</p> <p>6 I was told that I should consult him.</p> <p>7 Q. And who told you you should</p> <p>8 consult with Rutwik about</p> <p>9 teleconferences?</p> <p>10 A. Bouker.</p> <p>11 Q. And when did Bouker tell you</p> <p>12 that?</p> <p>13 A. Around the time he showed up.</p> <p>14 Q. Pre Boston or post Boston?</p> <p>15 A. Pre Boston.</p> <p>16 Q. After your telephone call with</p> <p>17 Albert when you were in Boston, did you</p> <p>18 have any other communications with</p> <p>19 Albert?</p> <p>20 A. No.</p> <p>21 Q. Going on in your complaint, you</p> <p>22 see the paragraph that starts I was</p> <p>23 sought out and recruited?</p> <p>24 A. Yes.</p> <p>25 Q. You were sought out and</p>	<p style="text-align: right;">Page 45</p> <p>1 V. VILLETTI</p> <p>2 A. He never said Guidepoint was a</p> <p>3 start-up. He said the content team was</p> <p>4 like a start-up, hence the quotation</p> <p>5 marks.</p> <p>6 Q. Okay. How many other content</p> <p>7 teams were at Guidepoint when you were</p> <p>8 interviewing?</p> <p>9 A. We were the content team.</p> <p>10 Q. If that team was a start-up,</p> <p>11 what other teams were there?</p> <p>12 A. At Guidepoint as a whole?</p> <p>13 Q. Correct.</p> <p>14 A. As I recall, there was the main</p> <p>15 business line, which was one-on-one</p> <p>16 client calls. There was a data team.</p> <p>17 There was a surveys team.</p> <p>18 Q. And was it your impression that</p> <p>19 those other teams were established and</p> <p>20 not, quote, start-ups?</p> <p>21 A. Yes.</p> <p>22 Q. And here you say that your</p> <p>23 employment trajectory is following a</p> <p>24 familiar pattern at Guidepoint.</p> <p>25 What was -- first, what was the</p>

<p style="text-align: right;">Page 46</p> <p>1 V. VILLETTI</p> <p>2 trajectory?</p> <p>3 A. That I was brought on under the</p> <p>4 premise that I was going to be</p> <p>5 effectively a leader in that particular</p> <p>6 segment of the business. And then over</p> <p>7 a period of time, my role gradually</p> <p>8 deteriorated.</p> <p>9 Q. Deteriorated in the way that we</p> <p>10 have talked about before?</p> <p>11 A. Yes.</p> <p>12 Q. And what was the familiar</p> <p>13 pattern at Guidepoint that you were</p> <p>14 referencing here?</p> <p>15 A. The familiar pattern is how they</p> <p>16 treated women.</p> <p>17 Q. And which women did you have in</p> <p>18 mind when you wrote familiar pattern?</p> <p>19 A. Ashlee and Jessica.</p> <p>20 Q. Which makes sense. Because then</p> <p>21 you start talking about Ashlee in your</p> <p>22 complaint, right?</p> <p>23 A. Yes.</p> <p>24 Q. And here you say you spoke with</p> <p>25 Ashlee's team following her departure,</p>	<p style="text-align: right;">Page 48</p> <p>1 V. VILLETTI</p> <p>2 A. Yes.</p> <p>3 Q. And your complaint also talks</p> <p>4 about Faiza. And that's Dr. Jibril,</p> <p>5 correct?</p> <p>6 A. Yes.</p> <p>7 Q. You said you were not permitted</p> <p>8 to discuss or defend the choice, the</p> <p>9 choice being to hire Dr. Jibril, and</p> <p>10 that you don't believe Albert even met</p> <p>11 her.</p> <p>12 As you sit here today, do you</p> <p>13 know whether Dr. Jibril ever met with</p> <p>14 Albert?</p> <p>15 A. Not to my knowledge.</p> <p>16 Q. You interviewed Dr. Jibril,</p> <p>17 correct?</p> <p>18 A. Yes.</p> <p>19 Q. Did anyone else interview</p> <p>20 Dr. Jibril?</p> <p>21 A. Yes.</p> <p>22 Q. Who?</p> <p>23 A. Bouker Pool, Justin Ruiz,</p> <p>24 Priscilla, and there was another guy in</p> <p>25 HR that I don't remember the name of.</p>
<p style="text-align: right;">Page 47</p> <p>1 V. VILLETTI</p> <p>2 correct?</p> <p>3 A. Yes.</p> <p>4 Q. And that no one had -- that the</p> <p>5 team had informed you that no one had</p> <p>6 sought their opinion and notified them</p> <p>7 and Ashlee was, in fact, a great</p> <p>8 leader.</p> <p>9 Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. And who was -- who were the</p> <p>12 members of Ashlee's team that you spoke</p> <p>13 with?</p> <p>14 A. I don't recall their names.</p> <p>15 Q. How many people?</p> <p>16 A. I talked to three or four of</p> <p>17 them.</p> <p>18 Q. Men? Women?</p> <p>19 A. Women.</p> <p>20 Q. All women?</p> <p>21 A. Yes.</p> <p>22 Q. And then your complaint</p> <p>23 continues and you talk about Jessica.</p> <p>24 We have talked about Jessica before,</p> <p>25 correct?</p>	<p style="text-align: right;">Page 49</p> <p>1 V. VILLETTI</p> <p>2 James, James something.</p> <p>3 Q. That you know, is Priscilla</p> <p>4 still an employee of Guidepoint?</p> <p>5 A. Currently?</p> <p>6 Q. Yes.</p> <p>7 A. I believe so.</p> <p>8 Q. Other than Dr. Jibril, had you</p> <p>9 made any other recommendations for hire</p> <p>10 at Guidepoint?</p> <p>11 A. No.</p> <p>12 Q. You talked about your associate</p> <p>13 leaving, right?</p> <p>14 A. Yes.</p> <p>15 Q. Were there efforts to replace</p> <p>16 her?</p> <p>17 A. Yes.</p> <p>18 Q. And what were those efforts?</p> <p>19 A. We -- I created a listing for</p> <p>20 the job. It was to be posted</p> <p>21 internally and externally.</p> <p>22 Q. Did that lead to any interviews?</p> <p>23 A. I was supposed to interview</p> <p>24 people. But it never happened.</p> <p>25 Q. Did anyone else interview anyone</p>

<p style="text-align: right;">Page 50</p> <p>1 V. VILLETTI</p> <p>2 to fill the position of your associate?</p> <p>3 A. My associate specifically, no.</p> <p>4 Q. So was there ever an occasion</p> <p>5 where you would have recommended</p> <p>6 someone to replace your departing</p> <p>7 associate?</p> <p>8 A. No.</p> <p>9 Q. The last paragraph in your</p> <p>10 complaint, you said that you appreciate</p> <p>11 the rapport between yourself and</p> <p>12 Priscilla and genuinely hope that we</p> <p>13 can find an amicable resolution here.</p> <p>14 Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. You have a good relationship</p> <p>17 with Priscilla?</p> <p>18 A. Very good relationship.</p> <p>19 Q. And you felt comfortable</p> <p>20 bringing this complaint to her</p> <p>21 attention?</p> <p>22 A. Yes.</p> <p>23 Q. And she was head of HR at that</p> <p>24 point, so the proper person to bring</p> <p>25 the complaint to?</p>	<p style="text-align: right;">Page 52</p> <p>1 V. VILLETTI</p> <p>2 with Priscilla?</p> <p>3 A. I don't know.</p> <p>4 Q. Did anyone else speak to you</p> <p>5 concerning your complaint after your</p> <p>6 March 12th meeting with Priscilla?</p> <p>7 A. I may have spoken to Priscilla</p> <p>8 again about it.</p> <p>9 Q. You had another meeting with</p> <p>10 Priscilla?</p> <p>11 A. I believe so.</p> <p>12 Q. And when did that occur?</p> <p>13 A. I don't know exactly.</p> <p>14 Q. After March 12th, though?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Was it just that one more</p> <p>17 meeting?</p> <p>18 A. I believe so.</p> <p>19 Q. And do you recall what you</p> <p>20 talked about with Priscilla at that</p> <p>21 second meeting?</p> <p>22 A. I don't recall.</p> <p>23 Q. Other than Priscilla, did you</p> <p>24 speak about your complaint with anyone</p> <p>25 else?</p>
<p style="text-align: right;">Page 51</p> <p>1 V. VILLETTI</p> <p>2 A. Yes.</p> <p>3 Q. If you could just turn back to</p> <p>4 the first page --</p> <p>5 - - -</p> <p>6 (Whereupon, a discussion was</p> <p>7 held off the record.)</p> <p>8 - - -</p> <p>9 Q. -- Exhibit K. And here there's</p> <p>10 Priscilla's reply, where she asks does</p> <p>11 3 o'clock work for you today -- to</p> <p>12 discuss today. And then your response:</p> <p>13 Yes, I will come by your office at that</p> <p>14 time. Thank you.</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. And you ultimately had a meeting</p> <p>18 with Priscilla about your complaint?</p> <p>19 A. Yes.</p> <p>20 Q. During that meeting, did</p> <p>21 Priscilla tell you what the next steps</p> <p>22 would be concerning your complaint?</p> <p>23 A. I don't recall.</p> <p>24 Q. Were any steps taken regarding</p> <p>25 your complaint following your meeting</p>	<p style="text-align: right;">Page 53</p> <p>1 V. VILLETTI</p> <p>2 A. No.</p> <p>3 MR. GRECH: Can you mark</p> <p>4 this as L, please?</p> <p>5 - - -</p> <p>6 (Whereupon, Defendant's</p> <p>7 Exhibit L, an e-mail exchange,</p> <p>8 was marked for identification.)</p> <p>9 - - -</p> <p>10 Q. Ms. Villetti, we are showing you</p> <p>11 what's been marked as Defendant's</p> <p>12 Exhibit L. If you could take a moment</p> <p>13 to look that over, please (handing).</p> <p>14 A. Okay.</p> <p>15 Q. Have you had a chance to look at</p> <p>16 Exhibit L?</p> <p>17 A. Yes.</p> <p>18 Q. Do you recognize it?</p> <p>19 A. Yes.</p> <p>20 Q. What is it?</p> <p>21 A. It is an e-mail from my boss,</p> <p>22 Bouker Pool, to Priscilla regarding</p> <p>23 Rutwik's inappropriate behavior and him</p> <p>24 leading to a threatening and hostile</p> <p>25 work environment.</p>

<p style="text-align: right;">Page 54</p> <p>1 V. VILLETTI</p> <p>2 Q. Had you seen this e-mail before</p> <p>3 today?</p> <p>4 A. Yes.</p> <p>5 Q. And what were the circumstances</p> <p>6 of you seeing this e-mail before today?</p> <p>7 A. The day my boss was filing this,</p> <p>8 he called me and he read the e-mail to</p> <p>9 me. And just said I want you to be</p> <p>10 aware I'm filing this complaint.</p> <p>11 Q. It was your understanding that</p> <p>12 Bouker called you and read the contents</p> <p>13 of this e-mail before he clicked send</p> <p>14 to Priscilla?</p> <p>15 A. I don't know the timing.</p> <p>16 Q. Did Bouker communicate to you</p> <p>17 that this is an e-mail I'm about to</p> <p>18 send or that I have sent to Priscilla?</p> <p>19 A. I don't recall.</p> <p>20 Q. But he read you the contents of</p> <p>21 what he explained was an e-mail</p> <p>22 complaint?</p> <p>23 A. Yes.</p> <p>24 Q. And it appears to be that</p> <p>25 complaint here?</p>	<p style="text-align: right;">Page 56</p> <p>1 V. VILLETTI</p> <p>2 But you can answer.</p> <p>3 A. I don't know.</p> <p>4 Q. When Bouker called you to say</p> <p>5 this is the content of my e-mail</p> <p>6 complaint, did he tell you who he was</p> <p>7 complaining about?</p> <p>8 A. I don't recall.</p> <p>9 Q. In the first paragraph, it</p> <p>10 mentions Rutwik by name?</p> <p>11 A. Yes.</p> <p>12 Q. Is Albert mentioned anywhere in</p> <p>13 this e-mail?</p> <p>14 A. Doesn't appear to be.</p> <p>15 Q. When you spoke to Bouker about</p> <p>16 the e-mail, did he say I'm filing the</p> <p>17 complaint about Albert?</p> <p>18 A. I don't recall him mentioning</p> <p>19 that.</p> <p>20 Q. Who were the members of Bouker's</p> <p>21 team on March 16, 2018?</p> <p>22 A. Would have been me, Justin,</p> <p>23 Jessica, and the four girls that</p> <p>24 reported to Jessica prior to being</p> <p>25 transferred to reporting to Bouker.</p>
<p style="text-align: right;">Page 55</p> <p>1 V. VILLETTI</p> <p>2 A. Yes.</p> <p>3 Q. And why did Bouker tell you he</p> <p>4 wanted you to know?</p> <p>5 A. As a member of his team, he</p> <p>6 would communicate something like that.</p> <p>7 Q. And Bouker read to you. And you</p> <p>8 see now that he reported to Priscilla</p> <p>9 that he was compelled to elevate the</p> <p>10 matter to a formal notification to HR,</p> <p>11 because members of his team, both</p> <p>12 verbally and via written communiqué,</p> <p>13 are complaining of threatening language</p> <p>14 and actions creating a hostile work</p> <p>15 environment.</p> <p>16 Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. This is all in reference to</p> <p>19 Rutwik?</p> <p>20 A. Yes.</p> <p>21 Q. Is any of Bouker's complaint</p> <p>22 here based upon Albert's actions or is</p> <p>23 it all Rutwik?</p> <p>24 MR. LICHTEN: I'm going to</p> <p>25 object, because it's speculating.</p>	<p style="text-align: right;">Page 57</p> <p>1 V. VILLETTI</p> <p>2 Q. And we talked about that on your</p> <p>3 first day, right?</p> <p>4 A. Yes.</p> <p>5 Q. Had you sent any written</p> <p>6 communications to Bouker about your</p> <p>7 hostile work environment complaints</p> <p>8 concerning Rutwik?</p> <p>9 A. I'm sorry?</p> <p>10 Q. Sure.</p> <p>11 Did you send Bouker anything in</p> <p>12 writing complaining that Rutwik was</p> <p>13 creating a hostile work environment?</p> <p>14 A. I believe I had complained about</p> <p>15 Rutwik's behavior several times to</p> <p>16 Bouker.</p> <p>17 Q. In writing?</p> <p>18 A. I don't recall the specifics,</p> <p>19 but likely so.</p> <p>20 MR. GRECH: We will review</p> <p>21 the production from plaintiffs.</p> <p>22 But to the extent that it's not</p> <p>23 in there, we are calling for the</p> <p>24 production of any written</p> <p>25 communiqué from Ms. Villetti to</p>

<p style="text-align: right;">Page 58</p> <p>1 V. VILLETTI</p> <p>2 Bouker complaining about the</p> <p>3 hostile work environment created</p> <p>4 by Rutwik. I'll follow up in</p> <p>5 writing.</p> <p>6 Q. Ms. Villetti, were you aware of</p> <p>7 any other written communications by any</p> <p>8 other members of your team to Bouker</p> <p>9 about a hostile work environment?</p> <p>10 A. I wasn't aware. And also I</p> <p>11 don't have access to my Guidepoint</p> <p>12 e-mail --</p> <p>13 Q. Sure.</p> <p>14 A. -- inbox.</p> <p>15 Q. Sure, understood.</p> <p>16 At the time you were employed by</p> <p>17 Guidepoint, do you recall receiving a</p> <p>18 written communication from any of these</p> <p>19 team members about Rutwik creating a</p> <p>20 hostile work environment?</p> <p>21 A. I can't recall.</p> <p>22 Q. Did you have communications with</p> <p>23 Justin -- strike that.</p> <p>24 Did you have conversations with</p> <p>25 Justin about Rutwik creating a hostile</p>	<p style="text-align: right;">Page 60</p> <p>1 V. VILLETTI</p> <p>2 A. It would have been the team.</p> <p>3 Q. You, Bouker, Justin, and</p> <p>4 Jessica?</p> <p>5 A. And the --</p> <p>6 Q. Four girls --</p> <p>7 A. -- four girls.</p> <p>8 Q. -- that had reported to Jessica</p> <p>9 but then reported to Bouker?</p> <p>10 A. Yes.</p> <p>11 Q. All right. And what was</p> <p>12 discussed during that -- well, was</p> <p>13 Rutwik at the meeting?</p> <p>14 A. I don't believe so, no.</p> <p>15 Q. And what about hostile work</p> <p>16 environment was discussed at this team</p> <p>17 meeting?</p> <p>18 A. I don't recall the specifics.</p> <p>19 But I remember a conversation</p> <p>20 surrounding his behavior towards the</p> <p>21 various team members.</p> <p>22 Q. And in that meeting, Bouker</p> <p>23 shared with the team that he felt</p> <p>24 Rutwik was creating a hostile work</p> <p>25 environment?</p>
<p style="text-align: right;">Page 59</p> <p>1 V. VILLETTI</p> <p>2 work environment?</p> <p>3 A. As my teammate, I would imagine</p> <p>4 so.</p> <p>5 Q. Do you recall specifically</p> <p>6 whether you did?</p> <p>7 A. I don't recall the specifics,</p> <p>8 but I likely did.</p> <p>9 Q. And did you have conversations</p> <p>10 with Jessica about Rutwik creating a</p> <p>11 hostile work environment?</p> <p>12 A. I believe it was discussed in a</p> <p>13 team meeting.</p> <p>14 Q. And when was this team meeting?</p> <p>15 A. Sometime after the Boston trip.</p> <p>16 Q. And who was at the meeting?</p> <p>17 A. Actually, strike that.</p> <p>18 Sometime before or after the</p> <p>19 Boston meeting, but in that period.</p> <p>20 Q. Sometime early March of 2018?</p> <p>21 A. I would say around then. It was</p> <p>22 one of the last team meetings we had</p> <p>23 prior to me being let go.</p> <p>24 Q. Okay. And who was at the</p> <p>25 meeting?</p>	<p style="text-align: right;">Page 61</p> <p>1 V. VILLETTI</p> <p>2 A. I don't recall.</p> <p>3 Q. Who on the team mentioned their</p> <p>4 concern about Rutwik's behavior during</p> <p>5 this team meeting?</p> <p>6 A. Jessica, as well as the other</p> <p>7 girls, the four girls.</p> <p>8 Q. Did Bouker?</p> <p>9 A. No.</p> <p>10 Q. Did Justin?</p> <p>11 A. No, not to my knowledge.</p> <p>12 Q. When Bouker called you to tell</p> <p>13 you about this e-mail, did you tell him</p> <p>14 that you had, a few days prior, done</p> <p>15 the same thing?</p> <p>16 A. I may have. I don't remember.</p> <p>17 Q. Before you sent your e-mail to</p> <p>18 Priscilla, did you speak with Bouker --</p> <p>19 A. No.</p> <p>20 Q. -- about your e-mail?</p> <p>21 A. No.</p> <p>22 Q. In the last paragraph in</p> <p>23 Bouker's e-mail, it says he's informed</p> <p>24 to his direct reports that he has filed</p> <p>25 a formal complaint, so they are aware</p>

<p style="text-align: right;">Page 62</p> <p>1 V. VILLETTI</p> <p>2 he's advocating on their behalf for a</p> <p>3 positive work environment.</p> <p>4 Do you see that?</p> <p>5 A. Yes.</p> <p>6 Q. Did Bouker have any direct</p> <p>7 reports other than the team members</p> <p>8 that we talked about?</p> <p>9 A. I don't -- not to my knowledge.</p> <p>10 I don't know.</p> <p>11 Q. During the team meeting, did</p> <p>12 Bouker say to the team all right, I'm</p> <p>13 going to report this to Priscilla?</p> <p>14 A. I don't remember.</p> <p>15 Q. Did you tell the team that you</p> <p>16 were going to report to Priscilla?</p> <p>17 A. No.</p> <p>18 Q. Before sending the e-mail to</p> <p>19 Priscilla, did you tell anyone that you</p> <p>20 were going to file a complaint?</p> <p>21 A. No.</p> <p>22 Q. Did anyone in human resources</p> <p>23 approach you about Bouker's complaint?</p> <p>24 A. I don't remember. But it's</p> <p>25 possible that the follow-up meeting I</p>	<p style="text-align: right;">Page 64</p> <p>1 V. VILLETTI</p> <p>2 to look at that, please (handing).</p> <p>3 A. (Witness complied).</p> <p>4 Q. Ms. Villetti, have you had a</p> <p>5 chance to look at Exhibit M?</p> <p>6 A. Yes.</p> <p>7 Q. Do you recognize it?</p> <p>8 A. Yes.</p> <p>9 Q. And what is it?</p> <p>10 A. It is an e-mail communication</p> <p>11 regarding the Boston trip between</p> <p>12 myself and Albert.</p> <p>13 Q. And this would have been around</p> <p>14 the time you had a telephone</p> <p>15 conversation with Albert about Boston?</p> <p>16 A. Yes. It appears it was right</p> <p>17 before and then right after.</p> <p>18 Q. Okay. If you could look at page</p> <p>19 1 of Exhibit M, Albert's March 1st</p> <p>20 e-mail at 12:04 p.m.</p> <p>21 Can you see that?</p> <p>22 A. Yes.</p> <p>23 Q. From now on, your focus is one</p> <p>24 hundred percent on teleconferences.</p> <p>25 Someone else will take over in-person</p>
<p style="text-align: right;">Page 63</p> <p>1 V. VILLETTI</p> <p>2 had with Priscilla discussed that.</p> <p>3 Q. The second meeting we talked</p> <p>4 about after your complaint?</p> <p>5 A. Yes.</p> <p>6 Q. Do you know if anyone</p> <p>7 communicated with Rutwik concerning</p> <p>8 Bouker's complaint?</p> <p>9 A. I don't know.</p> <p>10 Q. Do you know if anyone</p> <p>11 communicated with Justin about Bouker's</p> <p>12 complaint?</p> <p>13 A. I don't know.</p> <p>14 Q. What about Jessica?</p> <p>15 A. I don't know.</p> <p>16 MR. GRECH: Can we mark this</p> <p>17 as M, please?</p> <p>18 - - -</p> <p>19 (Whereupon, Defendant's</p> <p>20 Exhibit M, an e-mail exchange,</p> <p>21 was marked for identification.)</p> <p>22 - - -</p> <p>23 Q. Ms. Villetti, we are showing you</p> <p>24 what's been marked as Defendant's</p> <p>25 Exhibit M. If you could take a moment</p>	<p style="text-align: right;">Page 65</p> <p>1 V. VILLETTI</p> <p>2 events. Clear?</p> <p>3 Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. Who took over the in-person</p> <p>6 events after this e-mail communication?</p> <p>7 A. I don't know.</p> <p>8 Q. Was there any in-person events</p> <p>9 held after March 1st but before your</p> <p>10 separation from Guidepoint?</p> <p>11 A. I don't recall.</p> <p>12 Q. And Albert told you that your</p> <p>13 focus would be 100 percent on</p> <p>14 teleconferences, correct?</p> <p>15 A. Yes.</p> <p>16 Q. And in what way did that make</p> <p>17 you feel he was taking over your agency</p> <p>18 over telephone conferences?</p> <p>19 A. I don't believe he was taking</p> <p>20 over my agency over teleconferences.</p> <p>21 Q. Can you look back at your e-mail</p> <p>22 to Priscilla, second page of that</p> <p>23 exhibit, first full paragraph, there is</p> <p>24 a parenthetical on the third line. Now</p> <p>25 seemingly any agency overtake</p>

<p style="text-align: right;">Page 66</p> <p>1 V. VILLETTI</p> <p>2 teleconferences.</p> <p>3 A. Well, I was primarily referring</p> <p>4 to -- so if you read the full sentence</p> <p>5 there, Albert has effectively changed</p> <p>6 my role, abruptly taken away my</p> <p>7 leadership over the conferences, and</p> <p>8 now seemingly any agency over</p> <p>9 teleconferences.</p> <p>10 So that's discussing a full</p> <p>11 range of events that occurred.</p> <p>12 Q. And by agency over telephone</p> <p>13 conferences in your e-mail to</p> <p>14 Priscilla, you mean your leadership or</p> <p>15 control over teleconferences?</p> <p>16 A. Sure.</p> <p>17 Q. Okay. And back to the e-mail</p> <p>18 from Albert where he says your focus is</p> <p>19 one hundred percent on teleconferences,</p> <p>20 in that statement itself, was there</p> <p>21 anything in there that led you to</p> <p>22 believe you would have a deteriorated</p> <p>23 role concerning teleconferences?</p> <p>24 A. This was in conjunction with</p> <p>25 Rutwik's overreach into the</p>	<p style="text-align: right;">Page 68</p> <p>1 V. VILLETTI</p> <p>2 Is there anything in this</p> <p>3 exchange, other than maybe causing</p> <p>4 anxiety about seeing this sort of</p> <p>5 e-mail from your boss's boss, that</p> <p>6 would have made you think that Albert</p> <p>7 was acting this way because you are a</p> <p>8 woman, in this exchange, Exhibit M?</p> <p>9 A. I don't know. I haven't seen</p> <p>10 his exchanges with other women or men.</p> <p>11 Q. Did you talk to Bouker about his</p> <p>12 e-mail communications with Albert?</p> <p>13 A. Did I talk to Bouker --</p> <p>14 Q. About Bouker's e-mail</p> <p>15 communications with Albert?</p> <p>16 A. No.</p> <p>17 Q. Bouker never said to you, in</p> <p>18 effect, Albert can be pretty nasty in</p> <p>19 e-mails or something like that?</p> <p>20 A. No.</p> <p>21 Q. This March 1st exchange with</p> <p>22 Albert, did you speak with Albert again</p> <p>23 about Boston?</p> <p>24 A. No. I wasn't afforded the</p> <p>25 opportunity to.</p>
<p style="text-align: right;">Page 67</p> <p>1 V. VILLETTI</p> <p>2 teleconferences.</p> <p>3 Q. The statement to Priscilla about</p> <p>4 you seemingly losing agency over</p> <p>5 teleconferences, that was meant to</p> <p>6 reflect Rutwik's resurping that role?</p> <p>7 A. Yes. It wasn't just referencing</p> <p>8 the call and e-mail from Albert, it was</p> <p>9 referencing the interference from</p> <p>10 Rutwik.</p> <p>11 Q. Okay. And there is at least two</p> <p>12 e-mails in this exchange with Albert</p> <p>13 where he sends you nothing but question</p> <p>14 marks.</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. And Albert was your boss at the</p> <p>18 time, correct, one of your bosses?</p> <p>19 A. Albert was my boss's boss.</p> <p>20 Q. Right.</p> <p>21 So I would imagine seeing an</p> <p>22 e-mail like that from Albert would have</p> <p>23 caused some anxiety, correct?</p> <p>24 A. Yes. It's unstable.</p> <p>25 Q. Right.</p>	<p style="text-align: right;">Page 69</p> <p>1 V. VILLETTI</p> <p>2 Q. And did you seek out that</p> <p>3 opportunity?</p> <p>4 A. I was told that there would be a</p> <p>5 meeting arranged.</p> <p>6 Q. This would be a meeting between</p> <p>7 you and Albert?</p> <p>8 A. Yes.</p> <p>9 Q. And who told you that there</p> <p>10 would be a meeting?</p> <p>11 A. I believe Albert did.</p> <p>12 Q. And how did he tell you that?</p> <p>13 A. On the call.</p> <p>14 Q. So March 1st, you had both</p> <p>15 e-mail and telephone communications</p> <p>16 with Albert?</p> <p>17 A. Yes.</p> <p>18 Q. And during one of those</p> <p>19 telephone communications, Albert told</p> <p>20 you that, essentially, when you got</p> <p>21 back to New York, you would have a</p> <p>22 meeting?</p> <p>23 A. Yes.</p> <p>24 Q. And did he give you an idea of</p> <p>25 when that meeting would occur?</p>

<p style="text-align: right;">Page 70</p> <p>1 V. VILLETTI</p> <p>2 A. No.</p> <p>3 Q. Did he give you a sense of</p> <p>4 anyone else might be attending that</p> <p>5 meeting?</p> <p>6 A. No.</p> <p>7 Q. And did that meeting ultimately</p> <p>8 ever occur?</p> <p>9 A. No.</p> <p>10 Q. When you returned to New York,</p> <p>11 did you inquire about having the</p> <p>12 meeting?</p> <p>13 A. I may have.</p> <p>14 Q. And who did you ask?</p> <p>15 A. I would have asked Daniella</p> <p>16 likely who was the scheduler.</p> <p>17 Q. And what response did Daniella</p> <p>18 give you?</p> <p>19 A. I don't know.</p> <p>20 Q. Did you speak with Bouker about</p> <p>21 your exchange with Albert concerning</p> <p>22 Boston?</p> <p>23 A. Yes.</p> <p>24 Q. And how did you have that</p> <p>25 communication with Bouker?</p>	<p style="text-align: right;">Page 72</p> <p>1 V. VILLETTI</p> <p>2 Bouker?</p> <p>3 A. That Albert didn't seem to have</p> <p>4 the context for the trip.</p> <p>5 Q. As to why your presence was</p> <p>6 necessary?</p> <p>7 A. Yes.</p> <p>8 Q. And in your 11:28 a.m. e-mail in</p> <p>9 Exhibit M, you attempted to give him</p> <p>10 that context?</p> <p>11 A. Yes.</p> <p>12 Q. And his reply was still from now</p> <p>13 on your focus is a hundred percent on</p> <p>14 teleconferences, correct?</p> <p>15 A. Yes.</p> <p>16 Q. When you spoke to Bouker about</p> <p>17 your exchange with Albert, did you</p> <p>18 express to Bouker any concerns that</p> <p>19 Albert's conduct reflected gender</p> <p>20 discrimination?</p> <p>21 A. Could you --</p> <p>22 Q. Sure.</p> <p>23 You and Albert had this e-mail</p> <p>24 exchange March 1st?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 71</p> <p>1 V. VILLETTI</p> <p>2 A. I had a conversation with him</p> <p>3 when he was back.</p> <p>4 Q. When Bouker returned to the</p> <p>5 office?</p> <p>6 A. Yes.</p> <p>7 Q. And when did that occur?</p> <p>8 A. Sometime after the Boston trip.</p> <p>9 Q. Anything more specific?</p> <p>10 A. I don't remember details.</p> <p>11 Q. And you spoke with Bouker in</p> <p>12 person?</p> <p>13 A. Yes. Yes, I spoke to him in</p> <p>14 person.</p> <p>15 Q. And what did you tell Bouker</p> <p>16 about your exchange with Albert</p> <p>17 concerning Boston?</p> <p>18 A. Actually, I also spoke to him by</p> <p>19 e-mail I believe.</p> <p>20 Q. Okay. So you had communications</p> <p>21 with Bouker about your experiences with</p> <p>22 Albert concerning the Boston trip,</p> <p>23 correct?</p> <p>24 A. Yes.</p> <p>25 Q. And what did you express to</p>	<p style="text-align: right;">Page 73</p> <p>1 V. VILLETTI</p> <p>2 Q. Sometime thereafter, you talked</p> <p>3 to Bouker about it?</p> <p>4 A. Yes.</p> <p>5 Q. When you talked to Bouker about</p> <p>6 it, did you tell Bouker I think Albert</p> <p>7 did this to me because I'm a woman or</p> <p>8 something to that effect?</p> <p>9 A. I don't recall.</p> <p>10 Q. Do you have a last name for</p> <p>11 Daniella?</p> <p>12 A. No.</p> <p>13 Q. And she is a scheduler?</p> <p>14 A. She was an assistant/scheduler.</p> <p>15 Q. Whose assistant was she?</p> <p>16 A. I don't know. I imagine</p> <p>17 Albert's.</p> <p>18 Q. Other than Daniella, did you</p> <p>19 speak with anyone else about having a</p> <p>20 meeting with Albert?</p> <p>21 A. I don't remember.</p> <p>22 Q. Did you -- before you sent the</p> <p>23 e-mail to Priscilla, did you speak with</p> <p>24 Priscilla about your exchange with</p> <p>25 Albert on Boston?</p>

<p style="text-align: right;">Page 74</p> <p>1 V. VILLETTI</p> <p>2 A. Yes.</p> <p>3 Q. Okay. When did you speak with</p> <p>4 Priscilla?</p> <p>5 A. I spoke with her immediately</p> <p>6 after I spoke with Albert.</p> <p>7 Q. And how did you speak with</p> <p>8 Priscilla?</p> <p>9 A. On the phone.</p> <p>10 Q. And what did you tell Priscilla?</p> <p>11 A. I just told her what had</p> <p>12 occurred.</p> <p>13 Q. And what did Priscilla have to</p> <p>14 say in response?</p> <p>15 A. That it was not uncommon for</p> <p>16 Albert to misplace his anger.</p> <p>17 Q. Do you know what she meant by</p> <p>18 that?</p> <p>19 A. I don't.</p> <p>20 Q. Was it your understanding that</p> <p>21 Albert was angry at someone other than</p> <p>22 yourself?</p> <p>23 A. Yes. At Bouker.</p> <p>24 Q. And Albert was, at least in</p> <p>25 Priscilla's opinion, taking it out on</p>	<p style="text-align: right;">Page 76</p> <p>1 V. VILLETTI</p> <p>2 A. Yes.</p> <p>3 Q. You have, okay.</p> <p>4 And under what circumstances?</p> <p>5 A. My attorney showed me a copy.</p> <p>6 Q. Prior to your attorney showing</p> <p>7 you a copy, had you ever seen the</p> <p>8 e-mail exchange depicted in Exhibit N</p> <p>9 before?</p> <p>10 A. No.</p> <p>11 Q. Were you aware that that e-mail</p> <p>12 exchange had occurred?</p> <p>13 A. No.</p> <p>14 Q. This being your second time</p> <p>15 seeing it, what do you understand</p> <p>16 Exhibit N to be?</p> <p>17 A. Jessica seems to have some issue</p> <p>18 with me and she is discussing that with</p> <p>19 Bouker.</p> <p>20 Q. Was Jessica a supervisor of</p> <p>21 yours or were you considered on the</p> <p>22 same level?</p> <p>23 A. The same level.</p> <p>24 Q. And Jessica's concern here to</p> <p>25 Bouker is first about reportedly your</p>
<p style="text-align: right;">Page 75</p> <p>1 V. VILLETTI</p> <p>2 you?</p> <p>3 A. Yes.</p> <p>4 Q. And why would Albert have been</p> <p>5 mad at Bouker?</p> <p>6 A. Because he was skiing.</p> <p>7 Q. When you were in Boston, where</p> <p>8 was Bouker?</p> <p>9 A. Bouker was skiing.</p> <p>10 Q. Coincidentally with Albert; was</p> <p>11 that the same ski trip?</p> <p>12 A. Yes.</p> <p>13 MR. GRECH: N, please.</p> <p>14 - - -</p> <p>15 (Whereupon, Defendant's</p> <p>16 Exhibit N, an e-mail exchange,</p> <p>17 was marked for identification.)</p> <p>18 - - -</p> <p>19 Q. Ms. Villetti, we are showing you</p> <p>20 what's been marked as Defendant's N.</p> <p>21 If you could take a moment to look at</p> <p>22 that, please (handing).</p> <p>23 A. (Witness complied).</p> <p>24 Q. Ms. Villetti, have you ever seen</p> <p>25 Defendant's Exhibit N before?</p>	<p style="text-align: right;">Page 77</p> <p>1 V. VILLETTI</p> <p>2 absence from the office?</p> <p>3 A. Appears so.</p> <p>4 Q. And she said I'm sure you have</p> <p>5 also noticed, to Bouker, that she's</p> <p>6 barely done any work too.</p> <p>7 Would Jessica have had any way</p> <p>8 to review your work?</p> <p>9 A. No.</p> <p>10 Q. Would Bouker?</p> <p>11 A. Yes.</p> <p>12 Q. Jessica continues: Ms. Villetti</p> <p>13 has also taken upon herself to plan to</p> <p>14 attend just about any and all</p> <p>15 healthcare events. And this e-mail was</p> <p>16 March 1st.</p> <p>17 MR. LICHTEN: Is it</p> <p>18 March 1st?</p> <p>19 MR. GRECH: I'm sorry.</p> <p>20 Forgive me. February 28th.</p> <p>21 Thank you, Stuart.</p> <p>22 Q. This statement is in an e-mail</p> <p>23 dated February 28th.</p> <p>24 Either when you first saw</p> <p>25 Exhibit N or now, which healthcare</p>

<p style="text-align: right;">Page 78</p> <p>1 V. VILLETTI</p> <p>2 events did you think Jessica was</p> <p>3 referring to?</p> <p>4 A. I don't know.</p> <p>5 Q. Was the Boston trip coming up</p> <p>6 shortly after this February 28th</p> <p>7 e-mail?</p> <p>8 A. Yes.</p> <p>9 Q. And in the e-mail, Jessica says</p> <p>10 she just left at 3:00 p.m. today to</p> <p>11 take a flight to Boston for this one</p> <p>12 lunch meeting at 12:00 p.m. tomorrow.</p> <p>13 You see that?</p> <p>14 A. Yes.</p> <p>15 Q. Was this lunch meeting in Boston</p> <p>16 the same subject of your e-mail</p> <p>17 exchange with Albert?</p> <p>18 A. Yes.</p> <p>19 Q. Who is Nick Smith?</p> <p>20 A. He would have been a Guidepoint</p> <p>21 employee in Boston.</p> <p>22 Q. Guidepoint has a Boston office</p> <p>23 or had a Boston office in</p> <p>24 February 2018?</p> <p>25 A. I believe so.</p>	<p style="text-align: right;">Page 80</p> <p>1 V. VILLETTI</p> <p>2 referring to there?</p> <p>3 A. No idea.</p> <p>4 Q. Have you ever had an exchange</p> <p>5 with Justin where you felt you were</p> <p>6 rude to him?</p> <p>7 A. Justin is one of my best</p> <p>8 friends.</p> <p>9 Q. Still?</p> <p>10 A. Yes.</p> <p>11 Q. Did Justin ever come to you and</p> <p>12 say you were rude and demoralized him</p> <p>13 in front of Guidepoint employees?</p> <p>14 A. Never.</p> <p>15 Q. You maintain a friendship with</p> <p>16 Justin today?</p> <p>17 A. Yes.</p> <p>18 Q. When was the last time you spoke</p> <p>19 to Justin?</p> <p>20 A. He recently got engaged, so I</p> <p>21 congratulated him for that.</p> <p>22 Q. And when did you congratulate</p> <p>23 him?</p> <p>24 A. Sometime in the last couple of</p> <p>25 weeks.</p>
<p style="text-align: right;">Page 79</p> <p>1 V. VILLETTI</p> <p>2 Q. What other Guidepoint employees</p> <p>3 were at the Boston meeting?</p> <p>4 A. I don't remember.</p> <p>5 Q. Was it just you?</p> <p>6 A. No. There was one or two other</p> <p>7 people.</p> <p>8 Q. And you don't remember who they</p> <p>9 were?</p> <p>10 A. No.</p> <p>11 Q. Were those one to two others</p> <p>12 from the New York office or the Boston</p> <p>13 office?</p> <p>14 A. The Boston office.</p> <p>15 Q. And Jessica continues, just to</p> <p>16 keep Bouker in the loop, Ms. Villetti</p> <p>17 completely demoralized Justin in front</p> <p>18 of the whole team. It was uncalled for</p> <p>19 and rude. And I think it really hurt</p> <p>20 Justin.</p> <p>21 Do you see that?</p> <p>22 A. Yes.</p> <p>23 Q. Is that Justin Ruiz?</p> <p>24 A. Yes.</p> <p>25 Q. Do you know what Jessica is</p>	<p style="text-align: right;">Page 81</p> <p>1 V. VILLETTI</p> <p>2 Q. And you have maintained</p> <p>3 communications with Justin since your</p> <p>4 separation from Guidepoint?</p> <p>5 A. Periodically, yes.</p> <p>6 Q. And Justin is still with</p> <p>7 Guidepoint?</p> <p>8 A. I believe so.</p> <p>9 Q. In what capacity?</p> <p>10 A. He is creating content.</p> <p>11 Q. Healthcare content?</p> <p>12 A. No.</p> <p>13 Q. Do you know what kind of</p> <p>14 content?</p> <p>15 A. When I was there, he covered a</p> <p>16 variety of sectors; consumer, tech,</p> <p>17 gaming, other areas.</p> <p>18 Q. And Bouker replies to this</p> <p>19 e-mail from Jessica saying thanks,</p> <p>20 disappointed, but not surprised.</p> <p>21 Do you see that?</p> <p>22 A. Yes.</p> <p>23 Q. Before February 28th of 2018,</p> <p>24 had Bouker ever brought to you concerns</p> <p>25 that employees had thought you had been</p>

<p style="text-align: right;">Page 82</p> <p>1 V. VILLETTI</p> <p>2 rude or demoralizing to them?</p> <p>3 A. I don't recall.</p> <p>4 Q. Did you have conversations with</p> <p>5 anyone at Guidepoint about you being</p> <p>6 rude or demoralizing to other</p> <p>7 employees?</p> <p>8 A. I don't recall having any</p> <p>9 conversations with anyone about that.</p> <p>10 Q. Do you recall having</p> <p>11 conversations in which you were rude or</p> <p>12 demoralizing to an employee?</p> <p>13 A. I can't think of specific</p> <p>14 instances. But I know that if I had</p> <p>15 done such a thing, I would have</p> <p>16 apologized for it.</p> <p>17 Q. And Bouker says that he will</p> <p>18 deal with it.</p> <p>19 Did Bouker bring this concern of</p> <p>20 Jessica's to your attention?</p> <p>21 A. No.</p> <p>22 Q. And Jessica's reply is can I</p> <p>23 suggest we slap her with a PIP and</p> <p>24 please take away her privilege to</p> <p>25 travel, at least temporarily, until she</p>	<p style="text-align: right;">Page 84</p> <p>1 V. VILLETTI</p> <p>2 Q. Would Bouker?</p> <p>3 A. Yes.</p> <p>4 Q. Would Jessica have had the</p> <p>5 authority to take away your travel</p> <p>6 privileges?</p> <p>7 A. No.</p> <p>8 Q. Would Bouker?</p> <p>9 A. Yes.</p> <p>10 Q. And here Jessica's condition is</p> <p>11 until you get your performance up.</p> <p>12 Do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. How was your performance in late</p> <p>15 February, early March of 2018?</p> <p>16 A. It was -- I was performing well.</p> <p>17 Q. And Bouker's reply is how do we</p> <p>18 document this and do the right way.</p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. And it appears --</p> <p>22 MR. LICHTEN: That's not a</p> <p>23 reply to --</p> <p>24 MR. GRECH: I'm sorry. Fair</p> <p>25 enough.</p>
<p style="text-align: right;">Page 83</p> <p>1 V. VILLETTI</p> <p>2 gets her performance up.</p> <p>3 Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. Ms. Villetti, do you know what a</p> <p>6 PIP is?</p> <p>7 A. No.</p> <p>8 Q. Have you ever heard of a</p> <p>9 performance improvement plan?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. Do they do performance</p> <p>12 improvement plans at Guidepoint?</p> <p>13 A. Not to my knowledge.</p> <p>14 Q. Were you ever placed on a</p> <p>15 performance improvement plan at</p> <p>16 Guidepoint?</p> <p>17 A. No.</p> <p>18 Q. Was there ever a threat to place</p> <p>19 you on a performance improvement plan</p> <p>20 at Guidepoint?</p> <p>21 A. No.</p> <p>22 Q. Would Jessica have the authority</p> <p>23 to put you on a performance improvement</p> <p>24 plan?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 85</p> <p>1 V. VILLETTI</p> <p>2 Q. The next e-mail that appears on</p> <p>3 this Exhibit N is an e-mail from Bouker</p> <p>4 to Priscilla.</p> <p>5 Do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. And here it's forwarding the</p> <p>8 prior exchange?</p> <p>9 A. Yes.</p> <p>10 Q. And this is Bouker asking</p> <p>11 Priscilla how do we document this and</p> <p>12 do the right way.</p> <p>13 Do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. Did you ever have any</p> <p>16 conversations with Priscilla about</p> <p>17 Jessica's concerns?</p> <p>18 A. No.</p> <p>19 Q. Did you ever have any</p> <p>20 conversations with Priscilla about you</p> <p>21 being placed on a performance</p> <p>22 improvement plan?</p> <p>23 A. No.</p> <p>24 Q. Did you ever have any</p> <p>25 conversations with Priscilla about your</p>

<p style="text-align: right;">Page 86</p> <p>1 V. VILLETTI</p> <p>2 performance?</p> <p>3 A. No.</p> <p>4 Q. That you are aware of, were any</p> <p>5 of Jessica's concerns ever documented</p> <p>6 as Bouker requested?</p> <p>7 A. I don't know.</p> <p>8 Q. And this is the same Jessica</p> <p>9 that you felt was mistreated based upon</p> <p>10 her gender, correct?</p> <p>11 A. Yes.</p> <p>12 MR. GRECH: O.</p> <p>13 - - -</p> <p>14 (Whereupon, Defendant's</p> <p>15 Exhibit O, an e-mail exchange,</p> <p>16 was marked for identification.)</p> <p>17 - - -</p> <p>18 (Whereupon, a recess was</p> <p>19 taken at this time.)</p> <p>20 - - -</p> <p>21 Q. Ms. Villetti, can you just look</p> <p>22 back at Exhibit M, please, the e-mail</p> <p>23 exchange with Albert?</p> <p>24 A. Yes.</p> <p>25 Q. Page 2 in that exchange,</p>	<p style="text-align: right;">Page 88</p> <p>1 V. VILLETTI</p> <p>2 A. Yes.</p> <p>3 Q. What other performance metrics</p> <p>4 were you given?</p> <p>5 A. I wasn't given any.</p> <p>6 Q. And when we were talking about</p> <p>7 Exhibit N, which was Jessica's e-mail,</p> <p>8 right?</p> <p>9 A. Yes.</p> <p>10 Q. And she had said we have to get</p> <p>11 Valentia's performance up.</p> <p>12 Do you recall that?</p> <p>13 A. Yes.</p> <p>14 Q. And you had said your</p> <p>15 performance was good, right?</p> <p>16 A. Yes.</p> <p>17 Q. And how were you measuring your</p> <p>18 performance at that point?</p> <p>19 A. How was I measuring my own</p> <p>20 performance?</p> <p>21 Q. Correct. To come to the opinion</p> <p>22 that it was good.</p> <p>23 A. The numbers spoke for</p> <p>24 themselves.</p> <p>25 Q. And what numbers in particular?</p>
<p style="text-align: right;">Page 87</p> <p>1 V. VILLETTI</p> <p>2 Bates-stamped page 16, there is an</p> <p>3 e-mail from Albert to you and Priscilla</p> <p>4 dated March 1st at 11:11 a.m.</p> <p>5 You see that?</p> <p>6 A. Yes.</p> <p>7 Q. And Albert writes that -- I see</p> <p>8 he misspelled your name there --</p> <p>9 Valentina, Valentia, will be finishing</p> <p>10 up meetings in Boston and will be in</p> <p>11 the New York office tomorrow to work on</p> <p>12 teleconferences. The goal is 1.5 to 2</p> <p>13 teleconferences per week in healthcare.</p> <p>14 Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. Did you meet that goal when you</p> <p>17 returned from Boston?</p> <p>18 A. Yes.</p> <p>19 Q. Did you understand that to be</p> <p>20 one of your performance metrics?</p> <p>21 A. At that moment, yes.</p> <p>22 Q. Okay. And we had talked before</p> <p>23 about your difficulties in getting</p> <p>24 clarification on your performance</p> <p>25 metrics, right?</p>	<p style="text-align: right;">Page 89</p> <p>1 V. VILLETTI</p> <p>2 A. The number of attendees I had on</p> <p>3 my teleconferences and the feedback I</p> <p>4 was getting from the teleconferences.</p> <p>5 Q. When Albert said the goal is 1.5</p> <p>6 to 2 teleconferences per week in</p> <p>7 healthcare, was that meant to measure</p> <p>8 your performance or the entire team?</p> <p>9 A. I don't know. I took it to mean</p> <p>10 mine.</p> <p>11 Q. And how many teleconferences</p> <p>12 were you conducting per week before the</p> <p>13 Boston trip?</p> <p>14 A. I would say it averaged to</p> <p>15 around there.</p> <p>16 Q. 1.5 to 2?</p> <p>17 A. Per week, yeah.</p> <p>18 Q. Ms. Villetti, I'm going to show</p> <p>19 you what's been marked as Defendant's</p> <p>20 Exhibit O (handing).</p> <p>21 Have you had a chance to look at</p> <p>22 Defendant's O -- please take a chance</p> <p>23 to look at -- please take an</p> <p>24 opportunity to look at Defendant's O.</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 90</p> <p>1 V. VILLETTI</p> <p>2 Q. All right. Do you recognize it?</p> <p>3 A. No.</p> <p>4 Q. Have you ever seen it before?</p> <p>5 A. No.</p> <p>6 Q. What does it appear to be?</p> <p>7 A. It appears to be a letter from</p> <p>8 Jessica complaining about me on the day</p> <p>9 I was fired.</p> <p>10 Q. And this is the same Jessica</p> <p>11 that had the e-mail we talked about</p> <p>12 before?</p> <p>13 A. Yes.</p> <p>14 Q. And the same Jessica you felt</p> <p>15 that was mistreated because of her</p> <p>16 gender?</p> <p>17 A. Yes. Those two things are not</p> <p>18 related.</p> <p>19 Q. And she wrote an e-mail to</p> <p>20 Priscilla on March 19th, which was the</p> <p>21 date of your termination, correct?</p> <p>22 A. Yes.</p> <p>23 Q. And the e-mail reads I cannot</p> <p>24 work with Valentia anymore. She leaves</p> <p>25 early, comes in late practically every</p>	<p style="text-align: right;">Page 92</p> <p>1 V. VILLETTI</p> <p>2 A. Not really.</p> <p>3 Q. And how --</p> <p>4 A. I had one in-person meeting with</p> <p>5 her a week when she was in the office</p> <p>6 with the team.</p> <p>7 Q. Did Jessica have any authority</p> <p>8 to set your schedule?</p> <p>9 A. Absolutely not.</p> <p>10 Q. Who did?</p> <p>11 A. Bouker.</p> <p>12 Q. And Albert?</p> <p>13 A. By extension, yes.</p> <p>14 Q. Anybody else?</p> <p>15 A. Not to my knowledge.</p> <p>16 Q. Did Jessica ever raise any</p> <p>17 concerns with you about you're not</p> <p>18 doing your work?</p> <p>19 A. After I returned from Boston,</p> <p>20 there was quite a bit of chaos in the</p> <p>21 team. She was bickering with me as</p> <p>22 well as with everyone else. And I was</p> <p>23 just told that she was quote, unquote</p> <p>24 freaking out.</p> <p>25 Q. And who else was Jessica having</p>
<p style="text-align: right;">Page 91</p> <p>1 V. VILLETTI</p> <p>2 day. She has every excuse in the book</p> <p>3 for why she's not doing her work. She</p> <p>4 creates so much more drama among the</p> <p>5 team. She is just so awful to work</p> <p>6 with.</p> <p>7 I am begging you to please let</p> <p>8 this woman go. I am practically doing</p> <p>9 all of her work as it is. If she</p> <p>10 doesn't leave soon, I can guarantee a</p> <p>11 lot of my team will quit.</p> <p>12 Do you at least see where it</p> <p>13 says that there?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Had Jessica ever raised</p> <p>16 with you her concerns about your</p> <p>17 leaving early?</p> <p>18 A. Jessica was not even working</p> <p>19 primarily in the New York office.</p> <p>20 Q. And where --</p> <p>21 A. So I interacted with her maybe</p> <p>22 once a week, twice a week.</p> <p>23 Q. And how would you have those</p> <p>24 interactions? Were they in-person in</p> <p>25 the office?</p>	<p style="text-align: right;">Page 93</p> <p>1 V. VILLETTI</p> <p>2 these exchanges with other than</p> <p>3 yourself?</p> <p>4 A. She was freaking out at everyone</p> <p>5 on the team.</p> <p>6 Q. Everyone on the team?</p> <p>7 A. Yes.</p> <p>8 Q. And who coined the phrase</p> <p>9 freaking out for Jessica?</p> <p>10 A. I don't remember who initiated</p> <p>11 it. But I heard that phrase several</p> <p>12 times.</p> <p>13 Q. And what was your understanding</p> <p>14 as to why Jessica was freaking out?</p> <p>15 A. I was told that she had been</p> <p>16 subject to Albert's wrath before. And</p> <p>17 that when Albert would zoom on a group,</p> <p>18 she would freak out.</p> <p>19 Q. Did Jessica explain to you how</p> <p>20 she had been subject to Albert's wrath</p> <p>21 before?</p> <p>22 A. I don't recall.</p> <p>23 Q. Who told you that Jessica had</p> <p>24 been subject to Albert's wrath before?</p> <p>25 A. It came up in conversations</p>

<p style="text-align: right;">Page 94</p> <p>1 V. VILLETTI</p> <p>2 around the office.</p> <p>3 Q. With whom?</p> <p>4 A. I can't tell you.</p> <p>5 Q. What were the circumstances in</p> <p>6 which Jessica had previously</p> <p>7 experienced Albert's wrath?</p> <p>8 A. I don't know the specifics.</p> <p>9 Q. Did you understand Jessica's</p> <p>10 concern to be since Albert got mad at</p> <p>11 you in Boston that he was then going to</p> <p>12 take it out on the team?</p> <p>13 A. Yes. Albert was not just mad at</p> <p>14 me. He was also mad at Bouker.</p> <p>15 Q. For catching him skiing?</p> <p>16 A. Yes.</p> <p>17 Q. So he was mad at the two heads</p> <p>18 of the team?</p> <p>19 A. Appears so.</p> <p>20 Q. And there was freaking out among</p> <p>21 the team members that there would be</p> <p>22 fallout from that?</p> <p>23 A. One would imagine.</p> <p>24 Q. Did any of those conversations</p> <p>25 where there was team chaos after Boston</p>	<p style="text-align: right;">Page 96</p> <p>1 V. VILLETTI</p> <p>2 eventually asked Priscilla to fire you?</p> <p>3 A. No.</p> <p>4 Q. Did Priscilla ever bring these</p> <p>5 concerns of Jessica to your attention?</p> <p>6 A. I don't recall.</p> <p>7 Q. And you see Jessica's statement,</p> <p>8 I'm practically doing all of her work</p> <p>9 as it is?</p> <p>10 You at least see that statement?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Were there instances in</p> <p>13 which Jessica was doing your work?</p> <p>14 A. No. Jessica could not do my</p> <p>15 work.</p> <p>16 Q. And why not?</p> <p>17 A. She is not a healthcare</p> <p>18 specialist.</p> <p>19 Q. And what role did Jessica fill?</p> <p>20 A. She was a logistics and events</p> <p>21 manager.</p> <p>22 Q. Was it ever brought to your</p> <p>23 attention that anyone else other than</p> <p>24 Jessica was doing your work?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 95</p> <p>1 V. VILLETTI</p> <p>2 focus specifically on your work?</p> <p>3 A. No. There was a team meeting</p> <p>4 where we discussed everyone's role and</p> <p>5 how the expectation was for everyone to</p> <p>6 produce more.</p> <p>7 Q. And is this the same team</p> <p>8 meeting when we were talking about your</p> <p>9 e-mail with Albert?</p> <p>10 A. Sorry?</p> <p>11 Q. Correct me if I'm wrong. After</p> <p>12 -- when we were talking about the</p> <p>13 e-mail exchange with Albert in</p> <p>14 Boston --</p> <p>15 A. Yes.</p> <p>16 Q. -- you said you had</p> <p>17 conversations with team members after</p> <p>18 that, correct?</p> <p>19 A. Yes.</p> <p>20 Q. Is this the same team meeting?</p> <p>21 A. Possibly.</p> <p>22 Q. Had you ever been accused of</p> <p>23 creating drama among the team?</p> <p>24 A. No.</p> <p>25 Q. Were you aware that Jessica</p>	<p style="text-align: right;">Page 97</p> <p>1 V. VILLETTI</p> <p>2 Q. And you see here where Jessica</p> <p>3 says if she, meaning you, doesn't leave</p> <p>4 soon, Jessica can guarantee a lot of my</p> <p>5 team will quit.</p> <p>6 Who was part of Jessica's team</p> <p>7 at that point?</p> <p>8 A. I assume she is referencing the</p> <p>9 four girls who technically reported to</p> <p>10 Bouker.</p> <p>11 Q. Had any of those girls come to</p> <p>12 you with complaints about your conduct?</p> <p>13 A. No.</p> <p>14 Q. And who were these four girls?</p> <p>15 A. There was Sarah, Amrutha, Gabby,</p> <p>16 and Kendall. None of whom are still</p> <p>17 there.</p> <p>18 MR. LICHTEN: Are they older</p> <p>19 than 18?</p> <p>20 THE WITNESS: Yes.</p> <p>21 MR. LICHTEN: So then can we</p> <p>22 refer to them as women?</p> <p>23 MR. GRECH: That's fair.</p> <p>24 Q. The four women on Jessica's</p> <p>25 team?</p>

<p style="text-align: right;">Page 98</p> <p>1 V. VILLETTI</p> <p>2 A. Yes.</p> <p>3 Q. Other than the women themselves,</p> <p>4 had anyone brought a complaint on their</p> <p>5 behalf to you?</p> <p>6 A. Not that I recall, no.</p> <p>7 Q. Jessica said they would quit.</p> <p>8 And you said they are not there</p> <p>9 anymore.</p> <p>10 So why are they not there</p> <p>11 anymore?</p> <p>12 A. They have either quit or been</p> <p>13 fired.</p> <p>14 Q. Okay. Sarah, what happened to</p> <p>15 Sarah?</p> <p>16 A. I don't know the specifics.</p> <p>17 Q. Did she quit or was she fired?</p> <p>18 A. I believe she quit.</p> <p>19 Q. Do you know why?</p> <p>20 A. No.</p> <p>21 Q. Amrutha?</p> <p>22 A. I don't know.</p> <p>23 Q. Did she quit or was she fired?</p> <p>24 A. Don't know.</p> <p>25 Q. Gabby?</p>	<p style="text-align: right;">Page 100</p> <p>1 V. VILLETTI</p> <p>2 Q. Do you recall what you talked</p> <p>3 about during that second meeting with</p> <p>4 Priscilla?</p> <p>5 A. No.</p> <p>6 Q. Did you talk about this</p> <p>7 complaint from Jessica?</p> <p>8 A. Not to my recollection.</p> <p>9 Q. Did you talk about work</p> <p>10 distribution within your team?</p> <p>11 A. I don't recall the specifics of</p> <p>12 the conversation.</p> <p>13 Q. Did you talk about concerns over</p> <p>14 your attendance?</p> <p>15 A. Not that I recall.</p> <p>16 Q. Did you talk about any concerns</p> <p>17 about you're creating drama in the</p> <p>18 team?</p> <p>19 A. Not that I recall.</p> <p>20 Q. Did Priscilla tell you during</p> <p>21 this meeting that there was a concern</p> <p>22 that team members were going to quit?</p> <p>23 A. Not that I recall.</p> <p>24 MR. GRECH: P, Exhibit P.</p> <p>25 - - -</p>
<p style="text-align: right;">Page 99</p> <p>1 V. VILLETTI</p> <p>2 A. Don't know.</p> <p>3 Q. But not there anymore?</p> <p>4 A. No.</p> <p>5 Q. You don't know whether Gabby</p> <p>6 quit or was terminated?</p> <p>7 A. No.</p> <p>8 Q. What about Kendall?</p> <p>9 A. Don't know. She is not there.</p> <p>10 Q. Is Jessica still there?</p> <p>11 A. No.</p> <p>12 Q. Is there an events team that you</p> <p>13 are aware of?</p> <p>14 A. Yes.</p> <p>15 Q. Do you recall when we were</p> <p>16 talking about your e-mail complaint to</p> <p>17 Priscilla and you had a meeting with</p> <p>18 her that day?</p> <p>19 A. Yes.</p> <p>20 Q. And you had a second meeting</p> <p>21 with her that you remember?</p> <p>22 A. Yes.</p> <p>23 Q. Do you recall when that second</p> <p>24 meeting was?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 101</p> <p>1 V. VILLETTI</p> <p>2 (Whereupon, Defendant's</p> <p>3 Exhibit P, plaintiff's October</p> <p>4 27, 2018 letter was marked for</p> <p>5 identification.)</p> <p>6 - - -</p> <p>7 Q. Ms. Villetti, we are showing you</p> <p>8 what's been marked as Defendant's</p> <p>9 Exhibit P, as in Peter, for the</p> <p>10 purposes of this deposition. You can</p> <p>11 just take an opportunity to look at</p> <p>12 that (handing).</p> <p>13 A. Yes.</p> <p>14 Q. Have you ever seen Exhibit P</p> <p>15 before?</p> <p>16 A. Yes.</p> <p>17 Q. And when did you see Exhibit P</p> <p>18 before?</p> <p>19 A. Sometime after it was filed.</p> <p>20 Q. Okay. And this was a letter</p> <p>21 sent by Mr. Lichten to the EEOC?</p> <p>22 A. Appears to be, yes.</p> <p>23 Q. And you see the reference in</p> <p>24 there, first paragraph, second</p> <p>25 sentence, to a companion charging</p>

<p style="text-align: right;">Page 102</p> <p>1 V. VILLETTI</p> <p>2 parties case?</p> <p>3 A. Uh-huh.</p> <p>4 Q. Do you know who that companion</p> <p>5 party is?</p> <p>6 A. That would be Dr. Jibril.</p> <p>7 Q. Okay. And at what point did you</p> <p>8 and Dr. Jibril decide you would be</p> <p>9 companion parties in this litigation?</p> <p>10 A. Sometime after I filed.</p> <p>11 Q. After you filed what?</p> <p>12 A. My complaint with the EEOC.</p> <p>13 Q. Do you know whether your counsel</p> <p>14 received a case file from the EEOC in</p> <p>15 response to this request?</p> <p>16 A. I don't know.</p> <p>17 MR. GRECH: To the extent it</p> <p>18 hasn't been produced, we are</p> <p>19 going to follow up with a request</p> <p>20 in writing for the EEOC case</p> <p>21 file.</p> <p>22 MR. LICHTEN: Okay.</p> <p>23 Anything I got I turned over.</p> <p>24 MR. GRECH: Okay.</p> <p>25 MR. LICHTEN: I don't know</p>	<p style="text-align: right;">Page 104</p> <p>1 V. VILLETTI</p> <p>2 Q. And here you identify your</p> <p>3 occupation as an entrepreneur; is that</p> <p>4 correct?</p> <p>5 A. Yes.</p> <p>6 Q. In what respects did you operate</p> <p>7 as an entrepreneur in 2018?</p> <p>8 A. I was working on the company</p> <p>9 that I discussed before producing</p> <p>10 protein bars.</p> <p>11 Q. That's KIOKO?</p> <p>12 A. Yes.</p> <p>13 Q. Did you serve as an entrepreneur</p> <p>14 in any other respects in 2018 or than</p> <p>15 of KIOKO?</p> <p>16 A. No.</p> <p>17 Q. And if, Ms. Villetti, you could</p> <p>18 look at the last page of Exhibit Q.</p> <p>19 It's a 1099-G form.</p> <p>20 Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. Does this reflect your</p> <p>23 unemployment compensation?</p> <p>24 A. Yes.</p> <p>25 Q. And that amount was \$10,005.</p>
<p style="text-align: right;">Page 103</p> <p>1 V. VILLETTI</p> <p>2 if I got one.</p> <p>3 MR. GRECH: All right. We</p> <p>4 will follow up in writing.</p> <p>5 Q.</p> <p>6 - - -</p> <p>7 (Whereupon, Defendant's</p> <p>8 Exhibit Q, a 1040 form, was</p> <p>9 marked for identification.)</p> <p>10 - - -</p> <p>11 Q. Ms. Villetti, we are showing you</p> <p>12 what's been marked as Defendant's</p> <p>13 Exhibit Q for this deposition</p> <p>14 (handing).</p> <p>15 Do you recognize that document?</p> <p>16 A. Yes.</p> <p>17 Q. What is it?</p> <p>18 A. It is my 2018 tax filing.</p> <p>19 Q. And when were you separated from</p> <p>20 Guidepoint?</p> <p>21 A. March of 2018.</p> <p>22 Q. Did Guidepoint provide you with</p> <p>23 a W-2 form for the time that you worked</p> <p>24 for them in 2018?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 105</p> <p>1 V. VILLETTI</p> <p>2 Do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. Is that an accurate reflection</p> <p>5 of the unemployment compensation you</p> <p>6 received in 2018?</p> <p>7 A. Yes.</p> <p>8 Q. And was that compensation given</p> <p>9 to you as a result of your termination</p> <p>10 from Guidepoint?</p> <p>11 A. Yes.</p> <p>12 Q. And, Ms. Villetti, if you could</p> <p>13 turn to the second page of the 1040</p> <p>14 form, the main form?</p> <p>15 A. Yes.</p> <p>16 Q. Line Item 1, where it asks you</p> <p>17 to list your wages, salaries, tips, et</p> <p>18 cetera --</p> <p>19 A. Yes.</p> <p>20 Q. -- on the W-2 Form.</p> <p>21 Can you see that amount?</p> <p>22 A. Yes.</p> <p>23 Q. \$56,359?</p> <p>24 A. Yes.</p> <p>25 Q. And where did you acquire those</p>

<p style="text-align: right;">Page 106</p> <p>1 V. VILLETTI</p> <p>2 wages, salaries, and tips in 2018?</p> <p>3 A. Guidepoint.</p> <p>4 Q. When you submitted your 2018 tax</p> <p>5 return, did it have a W-2 from</p> <p>6 Guidepoint attached to it?</p> <p>7 A. Yes.</p> <p>8 Q. Did it have any other 1099s in</p> <p>9 addition to the 1099-G from New York</p> <p>10 State Department of Labor Unemployment?</p> <p>11 A. No.</p> <p>12 Q. Ms. Villetti, if you could look</p> <p>13 at Form 1040, Schedule 1. It's the</p> <p>14 third page of Exhibit Q.</p> <p>15 A. Yes.</p> <p>16 Q. Line Item 17, additional income.</p> <p>17 You see that?</p> <p>18 A. Yes.</p> <p>19 Q. It's showing a loss of \$19,835.</p> <p>20 You see that?</p> <p>21 A. Yes.</p> <p>22 Q. And this is for rental real</p> <p>23 estate, royalties, partnerships,</p> <p>24 S-corporations, trusts, et cetera?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 108</p> <p>1 V. VILLETTI</p> <p>2 The corporation is called what?</p> <p>3 A. Kenko, K-E-N-K-O.</p> <p>4 Q. And KIOKO is the name of the</p> <p>5 product?</p> <p>6 A. Yes.</p> <p>7 Q. That's the protein bar?</p> <p>8 A. Yes.</p> <p>9 Q. So it's Kenko as the</p> <p>10 S-corporation?</p> <p>11 A. Yes.</p> <p>12 Q. And what is your status with</p> <p>13 Kenko?</p> <p>14 A. I'm the CEO.</p> <p>15 Q. Okay. The 19,835 loss, that's</p> <p>16 attributable solely to the Kenko</p> <p>17 operating losses, correct?</p> <p>18 A. Yes.</p> <p>19 Q. There are no rental real estate</p> <p>20 associated with that?</p> <p>21 A. No.</p> <p>22 Q. Royalties?</p> <p>23 A. No.</p> <p>24 Q. Partnerships?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 107</p> <p>1 V. VILLETTI</p> <p>2 Q. Can you explain the loss of</p> <p>3 \$19,835 you experienced in 2009 -- 2018</p> <p>4 in that category?</p> <p>5 A. KIOKO is an S-corporation.</p> <p>6 Those are operating losses.</p> <p>7 Q. That you claim on your personal</p> <p>8 tax returns?</p> <p>9 A. Yes.</p> <p>10 Q. And do you see in Line Item 17,</p> <p>11 they request any attachment of Schedule</p> <p>12 E?</p> <p>13 A. Yes.</p> <p>14 Q. Did your 2018 tax returns -- was</p> <p>15 it accompanied by a Schedule E?</p> <p>16 A. Yes.</p> <p>17 MR. GRECH: I'm going to</p> <p>18 call for production of the</p> <p>19 Schedule E.</p> <p>20 Q. The \$19,835 loss, that was</p> <p>21 attributed solely to KIOKO as an</p> <p>22 S-corporation?</p> <p>23 A. KIOKO is the product. Yes. The</p> <p>24 corporation is called Kenko.</p> <p>25 Q. I'm sorry.</p>	<p style="text-align: right;">Page 109</p> <p>1 V. VILLETTI</p> <p>2 Q. Trusts?</p> <p>3 A. No.</p> <p>4 Q. And you still work as the CEO of</p> <p>5 Kenko today?</p> <p>6 A. Yes.</p> <p>7 Q. And have there been any changes</p> <p>8 to your compensation as CEO of Kenko</p> <p>9 since our last meeting?</p> <p>10 A. No.</p> <p>11 Q. Kenko is still not profitable?</p> <p>12 A. No.</p> <p>13 Q. Are there any other officers of</p> <p>14 Kenko?</p> <p>15 A. Yes. There is a CFO and a COO.</p> <p>16 Q. And last time we had some</p> <p>17 concern about the other founders of</p> <p>18 Kenko, correct?</p> <p>19 A. Yes.</p> <p>20 Q. Are those other founders the</p> <p>21 other officers?</p> <p>22 A. One of them is.</p> <p>23 MR. GRECH: To the extent</p> <p>24 that there are confidentiality</p> <p>25 concerns, we are going to respect</p>

<p style="text-align: right;">Page 110</p> <p>1 V. VILLETTI</p> <p>2 that. And we are going to ask</p> <p>3 for an identification in writing</p> <p>4 subject to confidentiality, as</p> <p>5 the court directed.</p> <p>6 We will follow up in writing</p> <p>7 with a request for the</p> <p>8 identification of the officers of</p> <p>9 Kenko.</p> <p>10 THE WITNESS: Yes.</p> <p>11 Q. Does Kenko have any other</p> <p>12 employees?</p> <p>13 A. No.</p> <p>14 Q. Does Kenko have an IT</p> <p>15 department?</p> <p>16 A. No.</p> <p>17 Q. Does it sell its product on a</p> <p>18 website?</p> <p>19 A. Yes. It's on Amazon Prime.</p> <p>20 Q. How is the product manufactured?</p> <p>21 A. There is a packaging -- there is</p> <p>22 a co-packer in Los Angeles.</p> <p>23 Q. And Kenko -- did Kenko make</p> <p>24 sales of the KIOKO bars in 2018?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 112</p> <p>1 V. VILLETTI</p> <p>2 A. Possibly. Or it will be</p> <p>3 directly on our own website.</p> <p>4 Q. So you suffered \$19,835 in</p> <p>5 operating losses attributed to Kenko in</p> <p>6 2018?</p> <p>7 A. Yes.</p> <p>8 Q. And those -- and what were the</p> <p>9 makeup of those losses?</p> <p>10 A. There is quite a bit of</p> <p>11 promotional and sampling and R&D in the</p> <p>12 early stages of a food company.</p> <p>13 Q. And would the 19,835 reflect</p> <p>14 your expenses associated with those?</p> <p>15 A. Yes.</p> <p>16 Q. Promotions and sampling?</p> <p>17 A. It would be sampling, R&D,</p> <p>18 marketing.</p> <p>19 Q. Did Kenko file its own tax</p> <p>20 return in 2018?</p> <p>21 A. Yes.</p> <p>22 Q. Does Dr. Jibril have any</p> <p>23 affiliation with Kenko?</p> <p>24 A. No.</p> <p>25 MR. GRECH: I'm going to</p>
<p style="text-align: right;">Page 111</p> <p>1 V. VILLETTI</p> <p>2 Q. And do you have a sense of the</p> <p>3 numbers, units sold?</p> <p>4 A. Not off the top of my head.</p> <p>5 Q. How long has Kenko been in</p> <p>6 operation?</p> <p>7 A. Kenko was incorporated in 2016.</p> <p>8 Q. Does Kenko have any business</p> <p>9 other than the sale of the KIOKO bars?</p> <p>10 A. Not currently, no.</p> <p>11 Q. Did it at any point?</p> <p>12 A. No.</p> <p>13 Q. Is there plans for it to have</p> <p>14 other businesses but the KIOKO bars?</p> <p>15 A. Yes.</p> <p>16 Q. And what are those other</p> <p>17 businesses?</p> <p>18 A. Other nutritional products.</p> <p>19 Q. And how far away is Kenko from</p> <p>20 offering these other nutritional</p> <p>21 products in terms of time?</p> <p>22 A. We are still in R&D. I couldn't</p> <p>23 say.</p> <p>24 Q. Would those also be available on</p> <p>25 Amazon Prime?</p>	<p style="text-align: right;">Page 113</p> <p>1 V. VILLETTI</p> <p>2 take a five-minute break.</p> <p>3 - - -</p> <p>4 (Whereupon, a recess was</p> <p>5 taken.)</p> <p>6 - - -</p> <p>7 MR. GRECH: And with that,</p> <p>8 Ms. Villetti, we are going to</p> <p>9 conclude your deposition. And I</p> <p>10 just want to thank you for your</p> <p>11 time for appearing and your</p> <p>12 answering our questions.</p> <p>13 THE WITNESS: Thank you.</p> <p>14 (Time noted: 4:48 p.m.)</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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Notary Public

DESCRIPTION	PAGE
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IDENTIFICATION OF THE OFFICERS OF KENKO IN WRITING SUBJECT TO CONFIDENTIALITY	110

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C E R T I F I C A T E

I, LEAH MILLER, a shorthand reporter and
Notary Public within and for the State of
New York, do hereby certify:

That the Witness(es) whose testimony is
hereinbefore set forth was duly sworn by me,
and the foregoing transcript is a true record
of the testimony given by such Witness(es).

I further certify that I am not related to
any of the parties to this action by blood or
marriage, and that I am in no way interested
in the outcome of this matter.



L. Miller

Leah Miller, a Court
Reporter and Notary Public

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LAWYER'S NOTES

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